



# CITY OF SANTEE

MAYOR  
John W. Minto

CITY COUNCIL  
Ronn Hall  
Stephen Houlahan  
Brian W. Jones  
Rob McNelis

FILED

Ernest J. Dronenburg, Jr. Recorder County Clerk

FEB 23 2017

**NOTICE OF INTENT TO ADOPT A  
MITIGATED NEGATIVE DECLARATION (AEIS2014-14)**

BY OK DEPUTY

Notice is hereby given that the public agency named below has completed an Initial Study of the following described project at the following location:

Public Agency: City of Santee

Project Name: Santee Townhomes

Project Description: Applications for a General Plan Amendment (GPA2014-4), Rezone (R2014-2), Tentative Map (TM2014-2), Development Review Permit (DR2014-7), and Environmental Initial Study (AEIS2014-14) for a proposed 10-unit residential condominium project (Santee Townhomes) on a 0.48-acre vacant parcel of land on the northeast corner of East Heaney Circle and Carlton Oaks Drive (APN 380-202-08). The project entails a General Plan Amendment and Rezone that would change the land use designation and zoning classification of the site from Neighborhood Commercial (NC) to Medium-High Density Residential (R14). AEIS2014-14 is an application that initiated review of the project in accordance with the California Environmental Quality Act (CEQA).

The 10-unit condominium project will be located on a vacant parcel of land that is presently devoid of sensitive plants and animals and surrounded by development on all sides. The proposed units will be divided into a six-unit building and a four-unit building separated by a drive aisle. The units will consist of three stories, with a two-car garage on the first story and living space on the second and third stories. Each unit will measure approximately 2,050 square feet in size. Full municipal services, including sewer and water, are available to the site.

Project Applicant: Heaney Properties, LLC


Project Location – Identify street address and cross streets or attach a map showing project site  
Northeast corner of East Heaney Circle and Carlton Oaks Drive (APN 380-202-08) in the City of Santee.

This Initial Study was completed in accordance with the Lead Agency's Guidelines for Implementing the California Environmental Quality Act. This Initial Study was undertaken for the purpose of deciding whether the project may have a significant effect on the environment. On the basis of such Initial Study, the Lead Agency's Staff has concluded that the project, after the incorporation of mitigation measures, will not have a significant effect on the environment, and has therefore prepared a Draft Mitigated Negative Declaration. The Initial Study reflects the independent judgment of the Lead Agency.

- ☐ The Project site IS on a list compiled pursuant to Government Code section 65962.5.
- ☒ The Project site IS NOT on a list compiled pursuant to Government Code section 65962.5.
- ☐ The proposed project IS considered a project of statewide, regional or areawide significance.
- ☒ The proposed project IS NOT considered a project of statewide, regional or areawide significance.
- ☐ The proposed project WILL affect highways or other facilities under the jurisdiction of the State Department of Transportation.
- ☒ The proposed project WILL NOT affect highways or other facilities under the jurisdiction of the State Department of Transportation.


<input type="checkbox"/>	A scoping meeting WILL be held by the Lead Agency.	
<input checked="" type="checkbox"/>	A scoping meeting WILL NOT be held by the Lead Agency.	
If the project meets the criteria requiring the scoping meeting, or if the agency voluntarily elects to hold such a meeting, the date, time and location of the scoping meeting are as follows:		
Date:	n/a	Time: Location:
Copies of the Initial Study and Draft Mitigated Negative Declaration are on file and are available for public review at the Lead Agency's office, located at: City of Santee, Department of Development Services, 10601 Magnolia Avenue, Santee, CA 92071		
The proposed Mitigated Negative Declaration can be obtained in electronic format by the following method: Download from <a href="http://www.cityofsanteeca.gov/">http://www.cityofsanteeca.gov/</a>		
Lead Agency address: 10601 Magnolia Avenue, Santee, CA 92071		
Comments will be received from February 23, 2017 to March 27, 2017		
Any person wishing to comment on this matter must submit such comments, in writing, to the Lead Agency prior to March 27, 2017. Comments of all Responsible Agencies are also requested.		
The Lead Agency will consider the project and the Draft Mitigated Negative Declaration at its meeting on: A FUTURE DATE AND TIME TO BE NOTICED.		
Date:	TBD	Time: TBD
If the Lead Agency finds that the project will not have a significant effect on the environment, it may adopt the Mitigated Negative Declaration. This means that the Lead Agency may proceed to consider the project without the preparation of an Environmental Impact Report.		

Date Received  
for Filing: Feb 23 2017

Michael Coyne   
Staff

(Clerk Stamp Here)

Associate Planner  
Title

**FILED IN THE OFFICE OF THE COUNTY CLERK**  
San Diego County on FEB 23 2017  
Posted FEB 23 2017 Removed  
Returned to agency on  
Deputy 



# CITY OF SANTEE

MAYOR  
Randy Voepel

CITY COUNCIL  
Jack E. Dale  
Ronn Hall  
Rob McNelis  
John W. Minto

## DRAFT MITIGATED NEGATIVE DECLARATION (AEIS2015-6)

1. Name or description of project:	Applications for a General Plan Amendment (GPA2014-4), Rezone (R2014-2), Tentative Map (TM2014-2), Development Review Permit (DR2014-7), and Environmental Initial Study (AEIS2014-14) for a proposed 10-unit residential condominium project (Santee Townhomes) on a 0.48-acre vacant parcel of land on the northeast corner of East Heaney Circle and Carlton Oaks Drive (APN 380-202-08). The project entails a General Plan Amendment and Rezone that would change the land use designation and zoning classification of the site from Neighborhood Commercial (NC) to Medium-High Density Residential (R14). AEIS2014-14 is an application that initiated review of the project in accordance with the California Environmental Quality Act (CEQA).
2. Project Location – Identify street address and cross streets or attach a map showing project site (preferably a USGS 15' or 7 1/2' topographical map identified by quadrangle name):	Northeast corner of East Heaney Circle and Carlton Oaks Drive (APN 380-202-08) in the City of Santee.
3. Entity or Person undertaking project:	
A. Entity	Heaney Properties, LLC
(1) Name:	Matt Reid
B. Other (Private)	
(1) Name:	
(2) Address:	
<p>The Lead Agency, having reviewed the Initial Study of this proposed project, having reviewed the written comments received prior to the public meeting of the Lead Agency, and having reviewed the recommendation of the Lead Agency's Staff, does hereby find and declare that the proposed project, after the incorporation of mitigation measures, will not have a significant effect on the environment. A brief statement of the reasons supporting the Lead Agency's findings is as follows: The project site is located in an urbanized area and the proposed use is in conformance with the General Plan and Municipal Code. The project is located in an area of planned growth where existing services including water, sewer, and transportation infrastructure are available to serve the project. After incorporation of mitigation measures, no significant adverse effects to any environmental resource areas were identified, as detailed in the attached Initial Study.</p>	
<p>The Lead Agency hereby finds that the Mitigated Negative Declaration reflects its independent judgment. A copy of the Initial Study is attached.</p>	
<p>The location and custodian of the documents and any other material which constitute the record of proceedings upon which the Lead Agency based its decision to adopt this Mitigated Negative Declaration are as follows: City of Santee, Development Services 10601 Magnolia Avenue Santee, CA 92071</p>	
<p>Comments will be received from February 23, 2017 through March 27, 2017. Any person wishing to comment on this matter must submit such comments, in writing, to the Lead Agency by March 27, 2017. Comments of all Responsible Agencies are also requested.</p>	
Phone No.: (619) 248-4100 ext. 160	

Date Received

for Filing: 2/23/17

Michael Coyne  
Staff

Mitigated Negative Declaration

FORM "E"

# RESPONSE TO COMMENTS

## LETTER

## RESPONSE



**San Diego County Archaeological Society, Inc.**  
Environmental Review Committee

20 March 2017

**RECEIVED**

MAR 21 2017

Dept of Development Services  
City of Santee

To: Mr. Michael Coyne, AICP  
Department of Development Services  
City of Santee  
10601 Magnolia Avenue  
Santee, California 92071

Subject: Draft Mitigated Negative Declaration  
Santee Townhomes Project  
GPA2014-4, R2014-2, TM2014-2, DR2014-7, AEIS2014-14

Dear Mr. Coyne:

I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the Santee Environmental Information Form and the Helix Environmental Planning letter report of April 20, 2016, we have the following comments:

We concur with the conclusion of the Helix report, that, while no cultural resources were discovered during either of the surveys of the property, an archaeological and Native American monitoring program should be a condition of project approval. It should, however, provide specific details of the monitoring program.

However, Mitigation Measure CUI-1 in the Environmental Information Form does not at all meet even the general standards identified in the Helix report. Construction equipment operators cannot be relied upon to identify archaeological resources should any be encountered. First and foremost, they have an inherent conflict. Their job is to get done promptly, not find reasons to delay completion. We recommend that the City obtain a detailed monitoring program (from the preconstruction meeting through to a report and curation, per General Plan Policy 8.2) from Helix and replace the existing CUI-1.

Thank you for the opportunity to participate in the environmental review process for this project.

Sincerely,

James W. Royle, Jr., Chairperson  
Environmental Review Committee

P.O. Box 81106 San Diego, CA 92138-1106 (619) 538-0935

**Response:** This letter was received from the San Diego County Archaeological Society during Public Review of the Mitigated Negative Declaration for the subject project. The letter indicates the committee of the San Diego Archaeological Society concurs with the conclusion of the cultural resources report, however recommends that the mitigation measure be revised to require an archaeological and Native American monitoring program for the project. The comment has been noted and Cultural Resources Mitigation Measure No. 1 (CUL-1) of the MND has been revised to include this recommendation. No further changes or mitigation are necessary. This comment does not raise an environmental issue that requires changes to or new mitigation in the Initial Study/Mitigated Negative Declaration (IS/MND). No additional response or action is required in accordance with CEQA Section 15073.5(c).



Draft Mitigated Negative Declaration

# Santee Townhomes Project

City of Santee, California



**Lead Agency:** City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

**Date:** February 1, 2017

Draft Mitigated Negative Declaration

# Santee Townhomes Project

City of Santee, California

**Lead Agency:**

City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

**CEQA Consultant:**

TRS Consultants  
438 Camino Del Rio S, Suite 223  
San Diego, CA 92108

**Project Applicant:**

Heaney Properties, LLC  
7918 El Cajon Blvd, Suite 361  
La Mesa, CA 91942

**Date: February 1, 2017**

**TABLE OF CONTENTS**

<b><u>Section Name &amp; Number</u></b>	<b><u>Page</u></b>
Initial Study.....	1
Environmental Analysis.....	4
Aesthetics.....	4
Agriculture and Forestry Resources.....	6
Air Quality.....	7
Biological Resources.....	13
Cultural Resources.....	15
Geology and Soils.....	21
Greenhouse Gas Emissions.....	24
Hazards and Hazardous Materials.....	27
Hydrology and Water Quality.....	29
Land Use and Planning.....	33
Mineral Resources.....	35
Noise.....	35
Population and Housing.....	38
Public Services.....	38
Recreation.....	41
Transportation and Traffic.....	42
Utilities and Service Systems.....	47
Mandatory Findings of Significance.....	50

**MND Figures**

Figure 1, Vicinity Map  
Figure 2, Site Plan  
Figure 3, Aerial View  
Figure 4, General Plan and Zoning Designations  
Figure 5a, Surrounding Area Views  
Figure 5b, Surrounding Area Views  
Figure 6a, Elevations  
Figure 6b, Colored Elevations  
Figure 7, Architectural Detail  
Figure 8, Landscape Plan  
Figure 9, Cumulative Projects



**MND Attachments/Technical Appendices**

- A:** Air Quality Assessment Report
- B:** Biology Report
- C:** Cultural Resources Survey Report
- D:** Paleontological Report
- E:** Geotech Report
- F:** CalEEMod Calculations
- G:** Project Facility Availability Forms
- H:** Storm Water Quality Management Plan (SWQMP)
- I:** Noise Report
- J (1):** Service Letter Santee School District
- J (2):** Service Letter Grossmont Union High School District
- K:** Cumulative Projects List

**ACRONYMS AND ABBREVIATIONS**

<b><u>Acronym</u></b>	<b><u>Definition</u></b>
ADT	Average Daily Trips
a.m.	Ante Meridiem (between the hours of midnight and noon)
AMSL	Above Mean Sea Level
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CalEEMod™	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
CARB	California Air Resources Board
CBC	California Building Code
CE	Circulation Element
CEQA	California Environmental Quality Act
Cfs	cubic feet per second
CMP	Corrugated Metal Pipe
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
CSS	Coastal Sage Scrub
CU/YDS	cubic yards
dB	Decibel
dBA	A-weighted Decibels
e.g.	exempli gratia, meaning “for example.”
FAA	Federal Aviation Administration
GC	General Commercial
GHG	Greenhouse Gas
HSC	Health and Safety Code
i.e.	that is
MSCP	Multiple Species Conservation Program
MT	metric ton
MTS	Metropolitan Transit System
NAAQS	National Ambient Air Quality Standards

**Santee Townhomes Project**  
**Mitigated Negative Declaration**

**Table of Contents**

NAHC	Native American Heritage Commission
NC	Neighborhood Commercial
NO <sub>x</sub>	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
PDMWD	Padre Dam Municipal Water District
p.m.	Post Meridiem (between the hours of noon and midnight)
PM	Particulate Matter
PM <sub>2.5</sub>	Fine Particulate Matter (2.5 microns or smaller)
PM <sub>10</sub>	Fine Particulate Matter (10 microns or smaller)
P/OS	Parks/Open Space
PRC	Public Resources Code
RAQS	Regional Air Quality Strategy
RHNA	Regional Housing Needs Analysis
ROGs	Reactive Organic Gasses
RTP	Regional Transportation Plan
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDGE	San Diego Gas and Electric
SFD	Santee Fire Department
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur Oxides
STS	Santee Trolley Square
USPS	United States Postal Service
VOCs	Volatile Organic Compounds
WRF	Water Recycling Facility

CITY OF SANTEE  
**INITIAL STUDY / ENVIRONMENTAL CHECKLIST FORM**

**Permit Application:** \_\_\_\_\_  
**Date Submitted:** \_\_\_\_\_

1. **Project Title:** Santee Townhomes
2. **Lead Agency:** City of Santee, 10601 Magnolia Avenue, Santee, CA 92071
3. **Proposed Use of the Site:** Multi-family residential -- ten (10) condominium units
4. **Project Location:** Northeast corner of Carlton Oaks Drive and E. Heaney Circle
5. **Project APN(s):** 380-202-08-00
6. 

<b>Applicant</b>	<b>Property Owner</b>
Name: Heaney Properties, LLC	Name: Heaney Properties, LLC
Address: 7918 El Cajon Blvd, Suite 361	Address: 7918 El Cajon Blvd, Suite 361
La Mesa, CA 91942	City, State, ZIP: La Mesa, CA 91942
Telephone: 619-933-9819	Telephone: : 619-933-9819
7. **Description of Project:** Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheet(s) if necessary. **Attach a vicinity map and site plan (Figures 1 and 2) in 8 ½" X 11" format.**  
  

Santee Townhomes (the Project) proposes a General Plan Amendment, Rezone, Tentative Map, and Development Review Permit for the construction of ten (10) condominium units on 0.48 gross acre (21,083 sq. ft.). Access to the site will be from East Heaney Circle. The Project will use the entire site to construct two buildings separated by a drive aisle. The buildings will be oriented in a north/south direction. The western-most building will support four units and will face East Heaney Circle. The eastern-most building will consist of six units. Each unit will be three stories and will provide a two-car garage on the first floor. A landscape area is provided for each unit. For the western-most building the landscape area will face East Heaney Circle, and for the eastern-most building the landscape area will face the eastern boundary. Three guest parking spaces, including one handicapped parking space, will be provided north of the 4-unit building. An ADA accessible route will also be provided in this parking area. The northwest corner of the Project site will provide a small common area. The southern area of the site parallel to Carleton Oaks Drive will provide a bio-retention basin and common area. An enclosure for trash/recycling bins will be located along the northern boundary. A common walkway will be provided from this enclosure eastward to the Project boundary and then southward along the eastern boundary. The current land use designation and zoning is Neighborhood Commercial (NC). The applicant requests the designation and zoning be changed to Medium to High Residential (R-14), 14-22 dwelling units per gross acre, to accommodate the proposed residential use. Figure 1, "Vicinity Map", and Figure 2, "Site Plan", attached, provide the general location and specific design of the project.
8. **Existing General Plan Designation:** NC (Neighborhood Commercial)
9. **Existing Zoning:** NC (Neighborhood Commercial)
10. **Existing Conditions:** (Is the site currently served by the following?)

Paved Road	X Yes	<input type="checkbox"/> No
Water Services	X Yes	<input type="checkbox"/> No
Sewer Services	X Yes	<input type="checkbox"/> No
Septic System	<input type="checkbox"/> Yes	X No
Electric Service	X Yes	<input type="checkbox"/> No

The site is relatively flat, with a slight elevational variation from 336 feet in the north to 330 feet in the south. The site has been graded in the past and is absent any structures or trash, and is sparsely vegetated. The entire site is fenced with chain-link.

11. **Surrounding Land Uses and Setting:** Briefly describe the project's surroundings, including plants, animals, any cultural, historic, or scenic aspects, type of land use, intensity of land use, and scale of development.

The site is surrounded by development. To the north and northwest is a single-family residential neighborhood. East of the site are commercial and retail uses. The commercial area to the east fronts Carlton Hills Boulevard and consists of two buildings housing professional offices including a chiropractic business and a small market with associated parking areas that touch the Project site's eastern boundary. Further to the southeast is a small retail center on the southwest corner of the Carlton Hills Boulevard/Carlton Oaks Drive intersection. To the southwest is a medium-density multi-family residential development. The area directly west of the Project site is developed with a two-story townhome project.

The surrounding parcels are designated by the General Plan and Zoning Code with the following:

North: Low-Medium Density Residential (R-2)

South: Medium-High Density Residential (R-14)

East: Neighborhood Commercial (NC)

West: Low-Medium Density Residential (R-2) and Medium-High Density Residential (R-14)

Please refer to Figure 3, "Aerial View", for a visual representation. Figure 4, "General Plan and Zoning Designations", depicts the planning aspects of the site and vicinity.

12. **Gillespie Field Airport Land Use Compatibility Plan (ALUCP):** Use the SD Airport Authority online tool <http://www.san.org/Airport-Projects/Land-Use-Compatibility#118025-gis-data> to answer the following:

**Airport Influence Area (AIA) (Exhibit III-5):**

☐ 1  
X 2  
☐ Not Applicable

**Overflight Zone (Exhibit III-4):**

X Yes  
☐ No

**Safety Zone (Exhibit III-2):**

☐ 1  
☐ 2  
☐ 3  
☐ 4  
☐ 5  
☐ 6  
X None

**Noise Contour (Exhibit III-1):**

X < 60dB CNEL  
☐ 60-65dB CNEL  
☐ 65-70dB CNEL  
☐ 70-75 dB CNEL  
☐ 75+dB CNEL

**Aviation Easement Area (Exhibit III-6):**

☐ Yes  
X No

**FAA Height Notification Boundary (Exhibit III-3):**

☐ Yes  
X No

The entire Gillespie Field plan can be download from:  
<http://www.san.org/Airport-Projects/Land-Use-Compatibility#118076-alucps>

13. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement, including those required by local regional, state, and federal agencies):

None.

14. **TOPOGRAPHY:** Describe the existing topography of the site.

Site elevation ranges from 330 to 336 feet Above Mean Sea Level (AMSL). The ground slopes slightly from north to south.

15. **WILL GRADING BE REQUIRED?**    ☒ Yes    ☐ No

CUT (CU/YDS): 820    FILL(CU/YDS): 230    PERCENT OF LOT GRADED: 100% already graded

**CERTIFICATION:** I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date: 02/01/2017

  
Applicant Signature

CHRISTOPHER D'AVIGNON, MANAGING MEMBER

For (Name of the Property Owner) HEANEY PROPERTIES, LLC

## ATTACHMENT

**ATTACH ADDITIONAL SHEETS, AS NEEDED, TO FULLY EXPLAIN ANY OF THE ANSWERS TO THE FOLLOWING QUESTIONS**

**SUMMARY OF ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist below.

- |                                                   |                                                         |                                                             |
|---------------------------------------------------|---------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics               | <input type="checkbox"/> Agriculture/Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources     | <input checked="" type="checkbox"/> Cultural Resources  | <input type="checkbox"/> Geology / Soils                    |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials  | <input type="checkbox"/> Hydrology / Water Quality          |
| <input type="checkbox"/> Land Use / Planning      | <input type="checkbox"/> Mineral Resources              | <input type="checkbox"/> Noise                              |
| <input type="checkbox"/> Population / Housing     | <input type="checkbox"/> Public Services                | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities / Service Systems    | <input type="checkbox"/> Mandatory Findings of Significance |



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS -- Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>The Project is not located in an area with a scenic vista. The site is surrounded on all sides by development, as shown in Figures 5a and 5b, "Surrounding Area Views". The Project is consistent with existing uses to the west and south, which are multi-family units. The scale and type of development proposed is shown in the elevations (Figure 6a and 6b). The Project's aesthetic design, shown in Figure 6a, "Elevations", Figure 6b "Colored Elevations", and Figure 7, "Architectural Detail", is consistent with existing design parameters in the area, where townhome designs have been used. Figure 5b, "Surrounding Area Views," shows a townhome project immediately west of the site. Therefore, the Project would have no impact on a scenic vista.</p>				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>There are no scenic resources within a state scenic highway in the area and therefore the Project would have no impact to this type of resource.</p>				

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>c) Substantially degrade the existing visual character or quality of the site and its surroundings?</p> <p>The existing visual character of the site consists of a relatively flat field of grass and a chain link fence. The Project would transform the site into a developed parcel with ten new townhomes with below unit parking and landscaped areas that would meet all Title 24 and City of Santee requirements for building design and landscaping. Refer to Figure 8, "Landscape Plan" for a depiction of the Project's landscape. The Project would maintain the visual character of the area by implementing a townhome design that would complement existing multi-family uses along Carlton Oaks Drive. Please refer to Figure 5a and 5b, "Surrounding Area Views". Views from existing residences to the north are currently obstructed by an approximately six-foot-high fence on the northern properties. These fences would not be altered by the Project. One window faces the existing fence, with a partial view over the fence. The Project's proposed building would be set back 10 feet from the property line in this area. The single family residence to the northwest would look across E. Heaney Circle to the Project's landscaped common area, driveway, and landscaped bank. Views after construction would consist of new townhome units built to the latest standards, with below unit parking, and buffer areas that would be landscaped and/or fenced. In summary, Project site improvements would change the visual character of the site; however, the character would not be degraded. As such, impacts related to the visual character or quality of the site would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
<p>d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</p> <p>There are currently no light sources on the property. The Project would introduce new sources of light and glare. However, light spillover, trespass, and potential glare is regulated by Section 17.30.030(B) of the City of Santee Municipal Code (City of Santee, 2016). This code section requires that all lights would be shielded or directed so as to not cause glare on adjacent properties or roadways. Consequently, lighting would be downward directed and shielded to limit light spillover and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	<b>AGRICULTURE AND FOREST RESOURCES --</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland (CDC, 1997). In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board. -- Would the project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?  None of these farmland types are present on the Project site. The site is classified as "Urban Developed" on the Farmland Mapping and Monitoring Program's <i>County of San Diego Important Farmland Map 2012</i> (CDC, 2014). As such, there is no impact.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?  The Project site is zoned for commercial uses and is not zoned for agricultural use. The site is not under a Williamson Act contract. As such, there is no impact.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?  None of these zoning provisions pertain to the Project site, therefore there is no impact.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d)	Result in the loss of forest land or conversion of forest land to non-forest use?  There is no forest land on the Project site, therefore there is no impact.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p> <p>There is no farmland on the Project site or in the vicinity that could be converted to non-agricultural use as a result of the Project. As such, there is no impact. .</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>III. <b>AIR QUALITY</b> -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
<p>a) Conflict with or obstruct implementation of the applicable air quality plan?</p> <p>The Project is located within the San Diego Air Basin (SDAB), which is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The Air Quality Management Plan (AQMP) has been developed to project future emissions within the SDAPCD.</p> <p>The federal Clean Air Act Amendments mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures demonstrating how the standards will be met, and is established by incorporating measures established during the preparation of AQMPs. The goal of an AQMP is to reduce pollutant concentrations below National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.</p> <p>The San Diego Regional Air Quality Strategy (RAQS) was developed pursuant to California Clean Air Act requirements and relies on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including information regarding projected growth in the County. CARB mobile source emissions and SANDAG growth projections are based in part on land use plans developed by the cities and the County through their General Plans. Projects that propose development consistent with (or below) the growth anticipated in the general plans would be consistent with the RAQS and the AQMP and the SIP.</p> <p>However, here, a General Plan Amendment is proposed, thus consistency with the AQMP and</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Issues:				

RAQS is determined based on the Project's proposed uses relative to regional growth forecasts and whether the SDAPCD emission thresholds for individual projects would be exceeded. The Regional Housing Needs Analysis (RHNA) (2010-2020) is a planning tool that can be used to determine if a project is consistent with the regional growth forecast. .

The current Regional Housing Needs Analysis (RHNA) (2010-2020) shows a total need for 728 housing units within the 10-20 unit/acre density range for the City of Santee (SANDAG, 2011). The Project would provide 10 units and accommodate 29 people, therefore the Project is consistent with the RHNA and related growth forecasts. Given the Project's consistency with the regional growth forecasts the RHNA, the Project would be consistent with the AQMP and the RAQS.

In addition, and as explained further below in section III(b) and the Air Quality Assessment Report (see Attachment A), the Project would also not exceed SDAPCD thresholds of significance during construction or operation. Based on these findings, the project is consistent with regional growth projections; and thus, would be consistent with the AQMP/RAQS. Impacts would be less than significant.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

☐
☐

X

☐

SDAPCD has established recommended air quality significance thresholds for both the construction and operation of projects located with the SDAB. These standards are as follows:

Pollutant	Construction Threshold	Operation Threshold
NOx	100 lbs/day	40 lbs/day
ROG	137 lbs/day	55 lbs/day
PM <sub>10</sub>	100 lbs/day	150 lbs/day
PM <sub>2.5</sub>	No standard	55 lbs/day
SOx	No standard	150 lbs/day

#### Construction Emissions

Regional construction emissions associated with



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

development of the project were calculated using CalEEMod (2013), and were compared against the construction emission thresholds above. Emission calculation included construction activities that would generate diesel emissions and dust, and assumed the export of 530 cubic yards of soil associated with site preparation and grading. Project construction was assumed to begin early in 2017 and to be completed in nine months.

Fugitive dust (PM<sub>2.5</sub> and PM<sub>10</sub>) could be generated by Project grading and construction. Construction activities such as grading vehicles would also emit ozone precursors (NO<sub>x</sub>), reactive organic gases (ROG), and carbon monoxide (CO).

Estimated maximum construction emissions were modeled as follows:

Pollutant	UnmitigatedMax Const. Emissions	SDACPD Threshold
NOx	22.6 lbs/day	100 lbs/day
ROG	111.5 lbs/day	137 lbs/day
PM <sub>10</sub>	1.6 lbs/day	100 lbs/day
PM <sub>2.5</sub>	1.4 lbs/day	No standard
SOx	0.02 lbs/day	No standard

As shown above, none of the SDACPD construction thresholds are exceeded by construction of the Project. Thus, construction-related emission impacts are less than significant

#### **Operational Emissions**

Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), and area sources including natural gas fire places, landscape equipment and architectural coating emissions as the structures are repainted over the life of the Project. The majority of operational emissions are associated with vehicle trips to and from the Project. Trip volumes were based on trip generation factors for multi-family residences and incorporated into CalEEMod.



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

Estimated maximum operational emissions were modeled as follows:

Pollutant	Unmitigated Max Oper. Emissions	SDACPD Threshold
NOx	0.62 lbs/day	40 lbs/day
ROG	0.92 lbs/day	55 lbs/day
PM <sub>10</sub>	0.45 lbs/day	150 lbs/day
PM <sub>2.5</sub>	0.12 lbs/day	55 lbs/day
SOx	0.00688 lbs/day	150 lbs/day

As shown above, none of the SDACPD operational thresholds are exceeded by construction of the Project. Therefore, Project emission impacts are less than significant.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☐
☐

X

☐

The Project is located in an area (San Diego County) that is listed as a federal non-attainment area for ozone (eight hour), and a state non-attainment area for ozone (one hour and eight hour standards), PM<sub>10</sub>, and PM<sub>2.5</sub> (see Table 2 of Attachment A, Air Quality Assessment Report). PM<sub>10</sub>, and PM<sub>2.5</sub> are primary pollutants; therefore these emissions can be quantified and compared to the SDAPCD thresholds. However, ozone is a secondary pollutant. Ozone is formed by the reaction of ROGs and NOx, which are ozone precursors. ROGs and NOx are primary pollutants (i.e. emitted from the exhaust pipe); therefore can be quantified.

For those primary pollutants for which the area is in non-attainment (PM<sub>10</sub> and PM<sub>2.5</sub>), construction and operation emissions are as follows:

Pollutant (Non-Attmt)	Construction Emissions	Operation Emissions
PM <sub>10</sub>	1.6 lbs/day	0.45 lbs/day
PM <sub>2.5</sub>	1.4 lbs/day	0.12 lbs/day

As shown above, the Project's emissions of these primary pollutants is exceedingly small, falling below

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

SCAPCD's thresholds by several orders of magnitude. In addition, ozone precursors, ROGs and NOx, do not exceed SCAPCD thresholds (see Threshold b). Based on the above, the Project's emissions and contribution towards ozone and PM levels are determined to be less than cumulatively considerable.

Further, the Project would also conform to all regulations including SDAPCD regulations for the control of pollutants and dust during construction such as watering and idling limits. Building operations would include advanced controls in conformance with Title 24 requirements for air exchange and air filtering in residential spaces. In addition, as described in detail in III.a) above, the Project is consistent with the AQMP and RAQS, and would not exceed growth projections for the City; therefore, the Project would not result in a cumulatively considerable net increase of ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Emission impacts would be less than significant.

- d) Expose sensitive receptors to substantial pollutant concentrations?

☐
☐

X

☐

Sensitive receptors in the area consist of existing residential uses to the north (adjacent to the site), west (approximately 75 feet away), and south (approximately 100 feet away). There are no schools, hospitals, or senior facilities in proximity to the Project site. Although site preparation would involve minimal amounts of grading because the site is small and relatively flat, dust and vehicle emission controls during construction would be required to conform to City of Santee Municipal Code Title 15 (Building and Construction Regulations), which includes specific measures for vehicle operation times and dust control. These would include frequent watering of graded areas, tuning of vehicles to assure minimal emissions, and limits on or cessation of grading on windy days. In addition, the Air Quality Assessment Report (Attachment A), specifically Tables 3 and 4, show that emissions during Project construction and operation would not exceed SDAPCD pollutant thresholds. SDAPCD thresholds are the industry standard thresholds used for impact assessments per SDAPCD. The construction thresholds are daily emission estimates in pounds per day. The values represent concentrations that disperse in ambient conditions to levels that are below those that present a health risk as determined by the US EPA and CARB. Based on the modeling results, the overall emissions for the proposed Project would be far less than the thresholds; and thus, would not pose a health concern

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

for residents or other receptors located in proximity to the site. As such, construction and operation impacts related to sensitive receptors in the area would be less than significant.

Further, the SDAB meets both state and federal standards for CO and was designated as a CO maintenance area by the US Environmental Protection Agency on January 30, 2006. While CO is not a regional pollutant of concern in the SDAB, elevated CO levels (i.e. hotspots) can occur at or near intersections that experience severe traffic congestion during cold winter temperatures. Screening for possible CO hotspots is performed based on the University of California Davis CO Protocol defined in the Transportation Project-Level Carbon Monoxide Protocol Revised December, 1997 UCD-ITS-RR-97. Section 4.7 of the protocol provides specific criteria for performing a screening level review for projects within a CO attainment area. According to Section 4.7, projects affecting an intersection or road segment operating at a LOS E or F and would worsen existing LOS require a detailed CO hotspot evaluation. If these conditions would not occur, no further review for CO hotspots is necessary. As referenced in Section XVI, *Transportation/Traffic* of this Initial Study, road segments in proximity to the Project site currently operate at LOS C or better consistent with City of Santee standards. The Project is not expected to generate enough trips to change the current LOS or adversely affect traffic operations. Thus, because the Project would have no adverse impact on traffic operations and existing operations exceed LOS E or F, no further evaluation with respect to CO hotspots is required. As such, impacts related to exposing sensitive receptors to CO hotspots are less than significant and no mitigation is required.

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

The Project is not expected to generate significant odors during construction because it will emphasize the use of paints and finishes with low volatile organic compound (VOCs) ratings. Moreover, while construction emissions, such as diesel, may generate odors, such odors would likely dissipate or dissolve in the air quicker than they can reach neighboring sensitive receptors and would be short term. No long term sources of odor would occur as a result of the Project. The Project would adhere to CBC's Title 24 restrictions on VOC generating materials and finishes. As a multi-family residential use, the Project would not be associated with objectionable odors, therefore no operational impacts would occur. Therefore, construction and operation-related impacts would be less than significant.

**IV. BIOLOGICAL RESOURCES -- Would the project:**

- |    |                                                                                                                                                                                                                                                                                                               |                          |                          |                          |   |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|---|
| a) | Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|---|

The Project site consists entirely of disturbed and developed/graded land. (Refer to Figure 3, Aerial View, for an overview of the site and its immediate surroundings) and there are no biological resources on the site. A biological survey of the site was conducted by Alden Environmental, Inc. on February 24, 2016 (See Attachment B, Biology Report). The survey found there were no sensitive plants or animals observed on the site, and based on the disturbed/developed condition of the land, such sensitive species are not expected to occur. Therefore the Project will have no impact on sensitive species.

Further, the project site is surrounded by development, and there are no conserved areas or wildlife corridors in the vicinity of the site. Given the lack of adjacent sensitive resources, the Project would not result in indirect impacts to sensitive biological resources, including those caused by Project noise and lighting.

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	<p>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p> <p>As part of the Biology Report (Attachment B), the site was assessed for features that could be considered jurisdictional by the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, or the Regional Water Quality Control Board. Features searched for included wetland vegetation, drainages, bed and banks, soils, and other features indicative of the presence of jurisdictional wetland or riparian features.</p> <p>The proposed Project is located within a developed area and does not support any drainage features or wetland vegetation. As such, the site does not support jurisdictional features. There are no riparian resources on the Project site, therefore no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c)	<p>Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p> <p>As described above in IV. (b), no wetland, riparian, or drainage areas were observed onsite that would be considered jurisdictional by the regulatory agencies.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d)	<p>Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p> <p>There is little or no wildlife movement through the site because it is entirely surrounded by development. The site has been cleared and is fenced. Further, there are no local or regional wildlife corridors present within or adjacent to the Project site; therefore, no impact to wildlife corridors would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p> <p>As stated in the City's General Plan, Conservation Element, the City is in the process of obtaining approval of its Multiple Species Conservation Program (MSCP) Subarea Plan; however, the City has not yet identified which areas will be conserved as permanent open space to preserve biological resources. Figure 3 clearly shows that the Project site is not located within or adjacent to any open space area; therefore, it is reasonable to conclude that the Project would not conflict with the MSCP. The biological survey conducted for the Project provides additional details. In addition, the Project site has no trees or other distinguishing biological features, thus is not in conflict with the City of Santee's policies related to tree preservation or other biological resources and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</p> <p>No adopted Habitat Conservation Plan, or Natural Community Conservation Plan would apply to the Project site. However, the City of Santee is currently working on a MSCP plan for the City. The City is an enrolled member of the regional MSCP, which calls for voluntary measures to protect Coastal Sage Scrub (CSS), which is the primary habitat of the California Gnatcatcher. As discussed in IV.e) above, the Project would not conflict with the MSCP. In addition, the Project site does not support Coastal Sage Scrub and is surrounded by developed land. As such, the Project would not conflict with a proposed or adopted habitat management plan and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>V. <b>CULTURAL RESOURCES</b> -- Would the project:</p>				
<p>a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?</p> <p>The Project site is vacant, grading and disturbed area. There are no historical resources on the Project site, therefore no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?</p> <p>The Project area is generally comprised of soil mapped as Redding-Urban land complex. The soil is</p>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Issues:</b>				

formed of alluvium from mixed sources. Many of the plant species naturally occurring in the vicinity of the Project area are known to have been used by native populations for food, medicine, tools, and ceremonial and other uses.

To assess potential impacts to archaeological resources, a cultural resources survey was conducted, which included a record search, Sacred Lands File search, review of historic maps and aerial photographs, a site visit conducted by Helix archaeologist Nicole Falvey and Kumeyaay Native American monitor Rachel Keliikoa, and a letter report (See Attachment C, Cultural Resources Report). The record search maps were reviewed and a record search of previously recorded archaeological resources, reports, and historic addresses of the Project property and a 1-mile radius was conducted. The Native American Heritage Commission was contacted for a Sacred Lands File search and list of Native American contacts. The walking survey of the Project site was conducted in parallel transects spaced 10 meters apart across the property.

The cultural resources analysis determined that 10 cultural resources had been previously recorded within a mile of the Project site. These sites include prehistoric lithic scatters, prehistoric artifact scatters, sites with bedrock milling features, and one prehistoric lithic isolate. No archaeological resources have been identified on the Project site.

A review of historic aerial photographs reveal that the Project site was part of a larger property that was enclosed by a fence and included about six roofed structures. However, by 1964 the buildings had been removed and since then the project site has appeared as an empty dirt lot. The Project site has been mass graded and therefore the ground has been disturbed. No archaeological or cultural resources were uncovered during ground disturbance.

Although mass grading of the site or the cultural resources analysis determined that there are no archaeological resources on the Project site, due to the presence of alluvial soil on the Project site and the cultural sensitivity of the area, the property has the potential to yield subsurface archaeological resources once project-related grading activities begin. As such, the following mitigation measure has been identified:

**Mitigation Measure CUL-1:**

Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>evidence to the City of Santee that the construction site crew members involved with operations are trained to recognize archaeological resources should such resources be uncovered during construction activities. If a suspected archaeological resource is identified on the property, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations in a 100-foot radius around the location of the find and seek identification and evaluation of the suspected resource by a professional archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2. If the resource is significant, the archaeological monitor and a representative of the appropriate Native American Tribe(s), the Project Applicant, and the City of Santee shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the archaeologist to protect the identified archaeological resource(s) from damage. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City of Santee prior to grading permit inspection approval.</p> <p>With implementation of Mitigation Measure CUL-1, impacts associated with archaeological resources would be less than significant.</p>				

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--	--------------------------------------	----------------------------------------------------------------	------------------------------------	--------------

- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

☐
☐
☐

X

A Paleontological Report was completed by Paleoservices, San Diego History Museum, dated July 28, 2016 (See Attachment D). Published geologic mapping of the Santee Townhomes Project site indicates the site is immediately underlain by older alluvial floodplain deposits of late Pleistocene age, with Eocene age sedimentary rocks of the Friars Formation cropping out about 0.4 mile north of the site.

It is understood that the proposed earthwork associated with construction of the Project site would involve removal and re-compaction of existing undocumented artificial fill materials. The actual depth of removals would be determined in the field by the geotechnical consultant and would depend on several factors including depth to native soils and ground water level; however, is not expected to exceed 3 ft. below grade (see Attachment E, Geotech Report). Artificial fill materials present between 0 – 6 feet below existing grade at the Project site have zero paleontological sensitivity. Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains, or to artificial fill materials which lose the stratigraphic/geologic context of any contained organic remains (e.g., fossils). As such, there essentially would be no direct impact or effect to potentially fossil-bearing sedimentary rocks (Pleistocene young alluvial floodplain deposits or Friars Formation). Because development of the Project site would not result in any direct impacts or effects to potentially fossil-bearing sedimentary rocks, the paleontology assessment prepared for the proposed Project recommends that no further action be taken regarding paleontological resources (i.e., no requirement to implement a paleontological mitigation program); thus there would be no impact.

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
	<p>The disturbance of human remains is governed by Health and Safety Code (HSC) section 7050.5, Public Resources Code (PRC) section 5097.98, and State CEQA Guidelines (CEQA) section 15064.5. The HSC section 7050.5 provides for a prohibition on disinterring, disturbing, or removing human remains from any location other than a cemetery. Public Resources Code section 5097.98 provides for a process of coordination between a lead agency and the Native American Heritage Commission (NAHC) when human remains are found during construction. State CEQA Guidelines section 15064.5(d) requires consultation with the appropriate Native Americans as identified by the Native American Heritage Commission (NAHC), as provided in Public Resources Code section 5097.98, in cases where human remains are identified as or are suspected to be of Native American origins. The consultation with the appropriate Native Americans as identified by the NAHC may result in an agreement for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials that could be found at the project site. Actions implementing such an agreement are exempt from Health and Safety Code 7050.5. Mandatory compliance with the above stated policies ensures that impacts associated with the disturbance of any human remains found on the Project site during grading activities would be less than significant.</p>				
e)	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	<p>i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1 [in applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native</p>				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Issues:				

American tribe]?

As discussed in Sections V. a) and b) above, the general Project vicinity was known to have been a source of plant and animal species known to have been used by native populations for food, medicine, tools, and ceremonial and other uses.

The Cultural Resources Assessment (Attachment C) for the Project included record search, a Sacred Lands File search, and a site visit by Kumeyaay Native American monitor Rachel Keliikoa. The Native American Heritage Commission was contacted for the Sacred Lands File search and list of Native American contacts. The walking survey of the Project site was conducted in parallel transects spaced 10 meters apart across the property.

The analysis determined that while 10 cultural resources had been previously recorded within a mile of the Project site, none had been identified on the Project site itself. However, in abundance of caution the following mitigation measure has been identified:

#### **Mitigation Measure CULT-1**

Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence to the City of Santee that the construction site crew members involved with operations are trained to recognize archaeological resources should such resources be uncovered during construction activities. If a suspected archaeological resource is identified on the property, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations in a 100-foot radius around the location of the find and seek identification and evaluation of the suspected resource by a professional archaeologist. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. The archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2. If the resource is significant, the archaeological monitor and a representative of the appropriate Native American Tribe(s), the Project Applicant, and the City of Santee shall confer regarding mitigation of the discovered resource(s). A treatment plan shall be prepared and implemented by the archaeologist to protect the identified archaeological resource(s) from damage. A final report containing the significance and treatment findings shall be prepared by the archaeologist and



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------------	----------------------------------------------------------------	------------------------------------	--------------

submitted to the City of Santee prior to grading permit inspection approval.

In addition, and consistent with AB 52 and SB 18, the City extended required invitations for formal consultation under these statutes to one (1) Native American tribe under AB 52 consultation procedures and 15 Native American tribes under SB 18 consultation. All tribes were contacted via USPS certified mail on November 1, 2016. No tribe has yet responded and no tribe has requested additional consultation. In addition, the consultation process did not identify the potential for any tribal cultural resources to be located on the Project site.

Given the above, it has been determined that any potential impacts to tribal cultural resources would be less than significant.

VI. **GEOLOGY AND SOILS** -- Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: ☐ ☐ X ☐



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.</p> <p>The Geotech Report by Geocon dated April 8, 2015 (Attachment E), used the computer program EZ-FRISK Version 7.62 to analyze fault locations and perform a probabilistic seismic analysis. The Newport-Inglewood/Rose Canyon Fault Zone is the closest fault to the Project, located 13 miles west of the Project site. The probability of ground acceleration exceeding 0.26 g is 10% over a 50 year period. To address potential for ground acceleration and other seismic effects such as frequency, duration, and soil conditions, site design for buildings and infrastructure would be required to comply with the California Building Code (CBC), as required by the City of Santee Municipal Code Title 15, specifically Chapter 15.04.010.</p> <p>Earthquake risk is present throughout California, and as a result a series of zone maps have been developed to assist in providing construction parameters for buildings and infrastructure. Using the U.S. Seismic Design Maps of the U.S. Geologic Survey, site-specific design criteria were obtained from the 2013 California Building Code (CBC) Chapter 16 (Structural Design) and Section 1613, Earthquake Loads. The CBC establishes a range of classes that carry specific design requirements. According to the analysis conducted in the Geotech Report, the building structure and improvements must be designed using Site Class D pursuant to the CBC. Specific CBC seismic design parameters such as ground motion spectral response and peak ground acceleration are referenced in Tables 6.4.1 and 6.4.2 of the geotechnical report. These design parameters would be used by state licensed engineers in the final design of grading and construction, as required by the CBC and state law. The Project would comply with state law in this regard. Therefore, seismic risk related impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
<p>ii) Strong seismic ground shaking?</p> <p>Given the analysis provided in Item VI. a(i) above, Project building plans would comply with applicable CBC seismic design parameters; thus impacts associated with seismic ground shaking would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii)	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	<p>The City of Santee's General Plan Safety Element, Section 8, identifies potential geologic hazards. According to General Plan Figure 8-3, Geotechnical/Seismic Hazard Map the Project site is located in Hazard Zone C3, which has a low to moderate liquefaction hazard. Further, as part of the geotechnical investigation conducted for the Project site, geotechnical engineers performed seismic-related ground failure testing, including liquefaction tests at two borings made on the site. The resulting data indicated the risk from liquefaction is low. Therefore, there is no impact.</p>				
iv)	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	<p>The Geotech Report (Attachment E) showed no evidence of landslides on the Project site and no landslides are known to exist on the Project site or on surrounding properties. As such, the risk of landslides on the site is low and there would be no impact related to landslides.</p>				
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	<p>The Project site consists of a dirt lot with sparse vegetation. Grading would encompass a small area (0.48 acres) and would conform to applicable 2013 CBC and City of Santee regulations associated with erosion control during construction. These include the use of straw wattles, watering, and cessation of grading on windy days. Topsoil and undocumented fill on the site would be removed and re-compacted to assure a stable building surface. The site would then be developed with hardscape, buildings, and landscaping that would stabilize soils and control runoff. As such, assuming mandatory compliance with applicable CBC and City regulations, the Project would not result in the loss of topsoil or soil erosion; thus, there would be no impact.</p>				

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?  The Geotech Report (Attachment E) found that the Project could be constructed as planned with adoption of the recommendations for design and construction that are referenced in the report as described in Item VI.a(i) and VI.b. These include removal and re-compaction of the undocumented fill and upper alluvium underlying the site, and construction using Site Class D designation. The Project would incorporate these design and construction requirements as part of the due diligence phase of bidding and construction in accordance with state law. As such, there would be no impact.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d)	Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code, creating substantial risks to life or property?  Soils on the site were assessed as having an expansive index of 90 or less, indicating low to moderate potential for soil expansion. Expansive soils will be addressed in the Project design in accordance with City of Santee building regulations and could include a program of removal, mixing with non-expansive soils, and pre-watering as needed. Therefore, impacts would be less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?  No septic systems are proposed as part of the Project. The Project would be served by the City of Santee's wastewater system. As such, there would be no impact.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
VII.	<b>GREENHOUSE GAS EMISSIONS --</b> Would the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?  No greenhouse gas (GHG) emission thresholds have been adopted by the San Diego Air Pollution Control district (SDAPCD), thus the Project has been evaluated based on the City of Santee's recommended/preferred threshold for all land use	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Issues:				

types of 900 metric tons (MT) of CO<sub>2</sub>E per year. Projects generating less than 900 MT CO<sub>2</sub>E annually are not considered individually or cumulatively significant with respect to impact on climate change. GHG emissions associated with the Project's construction period and long-term operational emissions were estimated using the CalEEMod model.

#### **Construction Emissions**

Construction activities would generate GHG emissions associated with equipment operation. The Project's construction emissions are confined to a relatively short period of time (approximately 9 months) in relation to the overall life of the Project. Emissions associated with the construction period were estimated based the projected maximum amount of equipment that would be used at one time. Air districts such as SDAPCD have recommended amortizing construction related emissions over a 30-year period to calculate total annual emissions. Construction of the Project would generate approximately 86 MT CO<sub>2</sub>e. Amortized over 30 years, the Project would generate 2.8 MTCO<sub>2</sub>e annually (see Attachment A, Air Quality Assessment Report, Table 5). See Attachment F, CalEEMod Calculations, for more detail regarding emission calculations.

#### **Operational Emissions**

Operational emissions include emissions from energy (21.6 metric tons per year), solid waste (2.0 metric tons per year), water (5.0 metric tons per year), and mobile sources (82.9 metric tons per year) (see Attachment A, Air Quality Assessment Report, Table 5). See Attachment F, CalEEMod Calculations, for more detail regarding emission calculations.

Together with the amortized construction emissions, total annual emissions for construction, operational and mobile sources were estimated to be 114.3 MT (See Attachment A, Air Quality Assessment Report, Table 5). See Attachment F, CalEEMod Calculations, for more detail regarding emission calculations. This is under the threshold of 900 MT used by the City of Santee. In addition, while the total GHG emissions would be lower than the City's threshold, the applicant would add design features to the Project that are intended to reduce GHG emissions. Design features may include providing pre-wiring for vehicle charging stations and roof-top solar as well as the installation of rain barrels or other landscaping elements that would reduce potable water demand for

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
irrigation purposes. As such, GHG impacts would be less than significant and no mitigation is required.				
<p>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?</p> <p>The City of Santee does not have an adopted Climate Action Plan or GHG reduction strategy. However, the Project is consistent with the current Regional Housing Needs Assessment (RHNA) (2010-2020), which shows a total need of 728 housing units within the 10-20 unit/acre density range forecast for the City of Santee (SANDAG, 2011). The proposed Project would provide 10 units and accommodate 29 people (see Attachment F, CalEEMod Calculations); and thus, would be consistent with the RHNA and related growth forecasts. as related to the reduction of greenhouse gas emissions. The RHNA process was integrated with the 2050 Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS) as required by Senate Bill (SB) 375. SB 375 requires that the RHNA and RTP/SCS processes occur together to better integrate housing, land use, and transportation planning to ensure that the state's housing goals are met and to help reduce greenhouse gas (GHG) emissions from cars and light trucks. The RTP/SCS and SIP conformity statement was approved by SANDAG on October 28, 2011. Based on these facts, the proposed Project is consistent with applicable plans related to the reduction of GHG emissions. As such, impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. <b>HAZARDS AND HAZARDOUS MATERIALS --</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?  The Project is a residential use that does not propose the routine transport, use, or disposal of hazardous materials. While construction materials are not expected to be hazardous, handling of materials would comply with the City of Santee's Storm Water Ordinance (Municipal Code 13.42) and the City's <i>Best Management Practices Design Manual</i> . This includes provisions for site clean-up, and removal of any unused construction materials. The Project would conform to the City of Santee's Municipal Code Title 15, which requires compliance with the California Building Code, Title 24, Part II (CALGreen Code). The code includes provisions for the control of vehicle and equipment fueling to the contractor's staging site. As a result, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?  The Project is a residential use that does not propose the use of hazardous materials. Further, handling of materials would comply with the City of Santee's Storm Water Ordinance (Municipal Code 13.42) and the City's <i>Best Management Practices Design Manual</i> , as noted, therefore minimizing potential for accidental release of hazardous materials. As such, no impacts relating to hazards from upset or accident conditions would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?  The Project does not propose the use or handling of acutely hazardous materials, substances, or waste. The use is residential in nature and the site is served by both sewer and solid waste services. Although the Project is located within one-quarter mile of Carlton Hills School, the Project will not emit or allow the handling of these substances and would pose no risk to the school population. Therefore, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X



Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?  The Project site is not on the "Cortese" list defined by Government Code section 65962.5. Therefore, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?  The Project is not located within a designated safety zone of the Gillespie Field ALUCP Safety Compatibility Map (San Diego, 2010, Exhibit III-2). Therefore, no special safety measures are required of the Project. As such, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?  The Project is not located within the vicinity of a private airstrip. Therefore, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?  The Project would develop a vacant lot and would not create structural barriers or reroute traffic so as to physically interfere with an adopted emergency plan. Further, the Project's residents would be included in any adopted emergency response plan. As such, no impact would occur and no mitigation is necessary.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--	--------------------------------------	----------------------------------------------------------------	------------------------------------	--------------

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐
☐
☐

X

The Project site is surrounded by development and no wildlands currently exist adjacent to the site. The entire site would be developed with structures, hardscape, landscaping, a bioretention basin, and drainage areas. The Project would conform to fire safety design features required by the City of Santee, specifically the California Fire Code, 2010, as amended by Ordinance 500. Design measures required by the California Fire Code include interior smoke detection devices, interior flame-activated sprinklers, and the use of fire safe exterior and interior design features and materials. All areas not built with structures would either be paved, landscaped with irrigated fire resistant plantings, or, in the case of the detention basin, would be kept free of any accumulation of litter or tall vegetation. Therefore, there would be no impact.

**IX. HYDROLOGY AND WATER QUALITY --**  
Would the project:

- a) Violate any water quality standards or waste discharge requirements?

☐
☐
☐

X

The Project would conform to the requirements of the City of Santee and the Regional Water Control Board as related to water quality standards and waste discharge requirements. The Project would be served by Padre Dam Municipal Water District for water and sewer service. The District has indicated it can serve the Project (see Attachment G, Project Facility Availability Forms). As related to surface water, the Project would conform to City of Santee Municipal Code Chapter 13.42, Stormwater Management and Discharge Control, and the City's *Best Management Practices Design Manual*. Runoff would be treated onsite through the use of one bioretention basin area located along the southern portion of the Project site. Therefore, impacts would be less than significant.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</p> <p>The Project would be served by the Padre Dam Municipal Water District as indicated by the service letters received from the District and included with the Project submittal (see Attachment G, Project Facility Availability Forms). The Project would not use groundwater. Therefore, depletion of groundwater supplies would not occur and there would be no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?</p> <p>The Project would alter the existing drainage pattern of the property. At present water drains to East Heaney Circle, and to a lesser extent Carlton Oaks Drive as uncontrolled runoff. Best Management Practices (BMPs) would be put into place to prevent erosion and siltation. The BMP for this project is the bioretention basin location along the southern boundary of the Project site. The bioretention basin would collect the storm runoff from rooftops, pavement, and landscaping, and would filter the water to remove pollutants. The basin would filter the water through a soil layer and an underlying gravel layer before releasing the storm runoff into an existing storm drain in East Heaney Circle. The basin is designed in accordance with the City's requirements (see Attachment H, SWQMP). As required by the City of Santee BMP Design Manual, the basin has been modeled to treat the 2-year storm and would have the capacity to collect and convey the 100-year storm. Although the basin is designed to capture a majority of the storm water runoff, there would be a slight increase in runoff leaving the site (approximately 1.2 cfs during the 100-year storm). The existing 42" CMP would have the capacity to convey the increased runoff from the Project site. As such, the bioretention basin would prevent erosion and siltation from occurring and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	<p>Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</p> <p>The Project would alter the drainage pattern of the site; however, the rate or amount of surface runoff would be controlled. Controls include a conveyance system of gutters and engineered hardscape to move water to the onsite bioretention basin. All Drainage Management Areas on the site would drain to this location. As described in IX.c) above, the basin is sized to accommodate potential storm runoff and existing storm drain in East Heaney Circle would have the capacity to convey the slight increase in runoff from the Project site. As such, the Project poses no threat of flooding on- or off-site and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e)	<p>Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?</p> <p>The Project's bioretention basin has been designed to prevent excess runoff. As described in IX.c), the basin is designed to treat the 2-year storm and would have the capacity to collect and convey the 100-year storm. There would be a slight increase in runoff leaving the site; however the existing 42" CMP storm drain in East Heaney Circle would have the capacity to convey the increased runoff from the Project site. In addition and as described in IX.c), the basin would filter the runoff to remove pollutants before releasing the water into the public storm drain system. As such, the Project would not contribute runoff that would exceed the capacity of storm water drainage systems or provide additional sources of polluted runoff. Therefore, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	<p>Otherwise substantially degrade water quality?</p> <p>The Project would use Padre Dam Municipal Water District water and sewer services. Service letters for the Project have been obtained and are included with the Project submittal (see Attachment G, Project Facility Availability Forms). The District maintains strict water quality controls through a regimen of tests and monitoring. Therefore, use of District water would pose no environmental risk and no impact would occur.</p> <p>As described in IX.c), the bioretention basin located along the Project site's southern boundary would filter potentially polluted runoff on-site before releasing the runoff into the public storm drain system. As such, water quality would not be degraded as a result of the Project. Therefore, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
g)	<p>Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</p> <p>The Project site is not located within a 100-year flood hazard area as mapped by federal or other agencies. Therefore, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
h)	<p>Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</p> <p>The Project site is not located within a 100-year flood hazard area. Therefore, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
i)	<p>Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</p> <p>The Project site is not located within a 100-year flood hazard area. The southern boundary of the Project site is located in the Lake Jennings Reservoir Inundation Area as indicated on the Dam Break Inundation Areas Map (Figure 8-2) of the City of Santee's General Plan Safety Element (Santee, 2003). According to the Safety Element of the City's General Plan, the California Department of Water Resources reviews the safety of the Chet Harrit Dam (Lake Jennings) annually and there are no hazardous conditions found at the structure. Therefore, the Project would not expose people or structures to a significant risk involving flooding as a result of the failure of a dam. As such, there is no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X



Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--	--------------------------------------	----------------------------------------------------------------	------------------------------------	--------------

- j) Expose people or structures to inundation by seiche, tsunami, or mudflow?

☐
☐
☐

X

The Project is not near the ocean and there is no danger posed by tsunamis, or large ocean waves. Three reservoirs are located east of the site and could drain into the San Diego River, which passes in an east to west fashion approximately 0.2 mile south and 18 feet below the site. These are the El Capitan Reservoir, located 12 miles east, Lake Jennings, 6.1 miles east, and San Vicente Reservoir, 7.8 miles northeast. A seiche, or a large wave in a standing body of water, occurring in one of these reservoirs would pose minimal risk to the site due to the distances water would have to travel, the distance from the site to the river, and the 18-foot elevation difference between the site and the river bed. There are no earthen dams or water courses near the site that which could result in a mudflow over the property. Therefore, no impacts would occur.

**X. LAND USE AND PLANNING -- Would the project:**

- a) Physically divide an established community?

☐
☐
☐

X

The Project site is located within an already urbanized area, and is surrounded by existing residential and commercial uses, which are compatible with the proposed Project. The scale of the Project is small, proposing 10 townhome residential units on 0.48 acres. The buildings onsite would be two story walk-ups that conform to the existing building height limits in the area. Building design is also consistent with established uses in the area. Therefore, the physical scale of the Project would complement rather than divide the community. As such, no impacts would occur.



Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	<p>Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</p> <p>The Project proposes a General Plan Amendment and Rezone to change the zoning from Neighborhood Commercial (NC) to Medium Density Residential (R-14). The City's General Plan originally envisioned a commercial use on this site because it is near a major intersection (Carlton Hills Boulevard and Carlton Oaks Drive). However, this type of use has become less likely over time because the area has been developed with residential uses to the north, south, and west. This compatibility issue is one reason the site has remained undeveloped, while the surrounding lots have been developed. Therefore, the proposed General Plan and Rezone would allow for development that is more consistent with existing uses as they have evolved. As such, impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	<p>Conflict with any applicable habitat conservation plan or natural community conservation plan?</p> <p>The City of Santee is currently working on a Multiple Species Conservation Program (MSCP) plan for the city. It is an enrolled member of the regional MSCP, which calls for voluntary measures to protect Coastal Sage Scrub, which is the primary habitat of the California Gnatcatcher. The Project site does not have any Coastal Sage Scrub on it and is surrounded by developed land. Further, as discussed in Item IV.e), Figure 4, General Plan and Zoning Designations, clearly shows that the Project site is not located within or adjacent to any open space area; therefore, it is reasonable to conclude that the Project is not located within a conservation area; thus, would not conflict with the MSCP. Therefore, the Project would not conflict with a proposed or adopted habitat management plan and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. MINERAL RESOURCES -- Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?  Mineral resources in Santee fall into two categories: MRZ 2, Resources Present, or MRZ 3, Resources Potentially Present, as stated in the City of Santee General Plan, Conservation Element, Section 4.2, Land Resources. The Project site is within the MRZ 3 zone according to the County of San Diego <i>Guidelines for Determining Significance and Report Format and Content Requirements</i> , Figure 2, Mineral Resource Zones. The City of Santee's Conservation Element notes that consideration of economics, land use compatibility, and environmental protection must be considered when evaluating the appropriateness of mining. Applying these considerations to the Project, it is clear that mining would not be an option on the site. Development exists on all four sides of the site. This includes predominantly residential uses within 0 to 125 feet from the site boundary, which are sensitive receptors for noise and air quality (dust) impacts. The site's size, at 0.48 acres, precludes recovery of resources of any extent. Additionally, the Project would not preclude recovery of mineral resources in off-site locations because the entire area around the site is developed. As a result, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?  Please see the response to XI a) above. No impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<b>XII. NOISE -- Would the project result in:</b>				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?  The City of Santee has established standards for noise levels for land uses within the city boundary. The Noise Element of the General Plan classifies multi-family residential uses as "Normally Acceptable." (Figure 7.2) if uses generate 65 dBA or less (Santee, 2003). This is a measure designed to closely represent the response of the human ear and take into account added sensitivity during nighttime hours (10 p.m. to 7 a.m.). Residential noise is generated by household activities such as air	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>conditioners, house cleaning, and animal noise, i.e., barking dogs. These activities are not considered significant noise sources; while they can be objectionable, they are normally classified as nuisance noise. In addition, the Noise Report (see Attachment I) conducted by Birdseye Planning Group found that operational exterior noise level would be 56.5 dBA, which is below the 65 dBA noise standard.</p> <p>To screen new residents from traffic noise on the east-facing wall of the eastern-most building on the site, the Project would install multi-paned windows and incorporate sound dampening insulation, as needed, to ensure interior noise levels are consistent with allowable noise levels per the 2013 CBC and City of Santee's building codes. In addition, the Noise Report (see Attachment I) found that operational interior noise level would be 26.5 dBA, which is below the 45 dBA noise standard.</p> <p>In addition, the Project is near Gillespie Field; however, is within the lowest noise contour (less than 60 dB CNEL). As such, the Project is not located in an area where significant airport noise is expected. Therefore, impacts related to airport noise would be less than significant.</p> <p>In regards to construction noise, noise levels during construction would be regulated by the Noise Abatement and Control Ordinance, Chapter 8.12.290 of the City of Santee Municipal Code. This regulation governs the maximum noise level and duration for construction equipment, bars construction during certain holidays and on Sunday, and limits construction equipment operational hours to between 7 a.m. and 7 p.m. Monday through Saturday. The Project would conform to these standards. Therefore, impacts related to construction noise would be less than significant.</p> <p>As such, and described in the above discussion, noise levels related to the proposed residential use, traffic, airport, and Project construction would not conflict with applicable noise standards; thus, impacts would be less than significant.</p>				

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?  No uses are proposed that would generate excessive groundborne vibrations or noise. In addition, no blasting is proposed and grading would be limited due to the small site and the type of soils that would have to be moved and compacted. As such, no impact would occur	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?  The residential use proposed would be consistent with other residential uses in the area. Therefore, the Project would not result in an increase in ambient noise levels. As such, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?  Project construction would generate temporary noise levels above existing levels. However, these activities would be governed by the Noise Abatement and Control Ordinance, Chapter 8.12.290, as discussed in XII.a) above; thus, impacts would be less than significant.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?  The Project is near Gillespie Field; however, is within the lowest noise contour (less than 60 dB CNEL). As such, the Project is not located in an area where significant airport noise is expected; thus, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?  The Project is not located in the vicinity of a private airstrip; thus, no impact would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. POPULATION AND HOUSING -- Would the project:</b>					
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	Due to the Project's small size (10 units), substantial population growth would not be induced. Using the average household size of 2.91 provided by SANDAG for the Santee area in 2010, this would amount to approximately 30 individuals. Individuals may move into the area or move from another part of the City. Assuming all individuals came from outside the City, 30 people would represent a very small percent (0.05%) of the total population of the City, which in 2010 consisted of 58,044 people, and would not exceed projected growth for the City, which is projected by SANDAG at approximately one (1) percent per year. Therefore, no impact would occur.				
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	The Project site is vacant and does not contain existing housing. As such, no impact would occur.				
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	The Project site is vacant and does not contain existing residents. As such, no impact would occur.				
<b>XIV. PUBLIC SERVICES -- Would the project:</b>					
a)	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

Fire protection?

☐
☐

X

☐

The Project would be served by the Santee Fire Department (SFD), which maintains a station at 9130 Carlton Oaks Drive, which is located approximately 0.25-mile west of the Project site. According to the City's Fire Marshall, the Department would consider constructing additional fire protection facilities if a project constructed over 500 dwelling units and/or was located outside the current standard response time, which is 10 minutes from receipt of call (via phone correspondence with Santee Fire Marshall, Bruce Kerl, on 9/23/16). The Project would construct 10 townhomes, which is significantly less than the 500 dwelling unit threshold. In addition, the Project site is located within a 5-minute response time from the closest fire station. As such, the Project would not cause the SFD to construct new facilities; therefore, impacts would be less than significant.

Police protection?

☐
☐

X

☐

Police protection in Santee is provided by the County of San Diego Sheriff's Department, headquartered at 8811 Cuyamaca Street in Santee. The Department provides law enforcement services for all areas of Santee under a contract between the Department and the City of Santee. The Project would generate 29 residents. The Department considers a variety of factors when determining whether or not it can accommodate a Project; however, according to Lt. Anthony O'Boyle of the Santee Police Department, the Project would not create a strain on police protection services that would cause the Department to construct new facilities (via phone correspondence with Lt. Anthony O'Boyle on 9/28/16). As such, the Project would not cause the Santee Police Department to construct new facilities; therefore, impacts would be less than significant. .



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Schools?</p> <p>The Project is served through the Santee School District for elementary and middle school students. Carlton Hills School for elementary and middle school students is located approximately 0.2 mile east of the Project. Grossmont Unified School District provides high school services. West Hills High School is located approximately a mile west of the Project. The Project would generate 29 new residents; therefore would create demand for public school services. Service letters from the school districts in question have been received and are included with the Project submittal (see Attachment J(1) &amp; J(2), School Service Letters). The Project would be required to pay school fees in accordance with California Senate Bill 50. According to the service letter from the Grossmont Unified School District, residential projects are required to pay \$1.00 per square foot. With mandatory payment of fees, the Projects impacts to public schools would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
<p>Parks?</p> <p>Neighborhood and regional parks are located in the area. An improved trail with an improved trailhead is located 315 feet south of the Project site. Santee Recreational Lakes is located approximately 0.3 mile to the west of the Project site. The extensive Town Center Community Park is approximately 0.9 mile to the east of the Project site. Therefore, ample park facilities are available to serve the Project and the Project would not result in overcrowding at these parks because the Project is small and the park facilities are numerous, close by, and large. Therefore, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<p>Other public facilities?</p> <p>The Project is not expected to affect other public facilities and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV.	<b>RECREATION --</b> Would the project:				
a)	<p>Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</p> <p>Please refer to Item XIV.a) above. An additional 30 persons could move into the area and utilize local parks. However, local park facilities are numerous, extensive, and several are located near the Project site. Therefore, the small number of residents generated by the Project would not affect the function of local parks and no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b)	<p>Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?</p> <p>No recreational facilities are proposed as part of the Project. As such, no impact would occur.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

**XVI. TRANSPORTATION / TRAFFIC --** Would the project:

- |    |                                                                                                                                                                                                                                                                                                                                                                                                                            |                          |                          |   |                          |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|---|--------------------------|
| a) | Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|---|--------------------------|

The Project does not conflict with plans or ordinances related to the circulation system because it would have a minimal impact on traffic patterns. The Project would generate an estimated 80 Average Daily Trips (ADT) (8 trips per townhome). Existing roadways can accommodate this minimal increase in traffic, as discussed in XVI (b) below. Trips would be minimized due to the proximity of many commercial services within walking distance of the site. The site is also served by the Metropolitan Transit System (MTS), which includes the Santee Trolley Square (STS) approximately 1.5 miles southeast from the site, which is an approximately 30-minute walk. Bus service via Route 834 is also available to STS. STS provides bus and trolley links to other parts of the region.

Construction would require 590 cubic yards of export. The Project would conform to City of Santee's *Best Management Practices Manual*, and *Moving Permit Regulations* as they pertain to repetitive transport of materials. These regulations govern vehicle size, regulate transport times so as to minimize noise and traffic disruption, require trucks to avoid residential streets, use an approved route of travel, and cover loads to minimize dust; thus compliance with these regulations would reduce construction related traffic impacts. Due to the minimal increase in traffic that would be generated by the Project, proximity to public transit and commercial services, and compliance with City requirements related to minimizing construction traffic impacts, the Project would not conflict with transportation plans or ordinances and impacts would be less than significant.

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

- b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

☐
☐

X

☐

Roadways in the vicinity operate at acceptable levels of service, as detailed in the *City of Santee Circulation Element Update: Existing Conditions Report* (CE Update) prepared by Chen & Ryan and published June 27, 2014. Roadway segment evaluation in Santee is governed by *SANTEC/ITE Guidelines for Traffic Impact Studies in the San Diego Region*. Key road segments including routes to SR-52, SR-125, and the town Center were evaluated. The road segments, their operational ADT range (as of the CE Update), design capacity, and LOS range, are as follows:

Mast Blvd from SR-52 EB Ramp to Carlton Hills Boulevard segments, 6,900 to 21,500 operational ADT, 40,000 ADT design capacity, LOS A-C.

Carlton Hills Boulevard from Mast Blvd. to Mission Gorge Road, 9,100 to 21,400 operational ADT, 35,000 design capacity, LOS A and C.

Mission Gorge Road, from SR-52 EB Ramps to Magnolia Avenue, 12,400 to 39,500 operational ADT, 40,000 to 60,000 ADT design capacity, LOS A -- C.

A LOS of D or better is acceptable according to the City of Santee General Plan, Circulation Element, Section 6.0, Policy 1.8. The Project would generate 80 ADT. The addition of all of this traffic to any one traffic segment discussed above would not degrade the level of service to an unacceptable level. As such, Project impacts to road segments would be less than significant.

Key intersections were also evaluated in the *City of Santee Circulation Element Update: Existing Conditions Report*. Figure 3-18, and Tables 3.18 and 3.19 of the report provide a summary of the data. Intersections from the Project site to key freeway links, with their report designation and LOS designation for AM and PM Peak Hours, respectively, are provided in the table below:

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

Intersection	Report #	AM	PM
SR-52 EM Ramps/Mast Blvd, Intersection	1	A	A
SR-52 WB Ramps/Mast Blvd	2	C	A
West Hills Pkwy/Mast Blvd	3	D	C
Carlton Hills Boulevard/Mast Boulevard	4	C	C
SR-52 WB On/Mission Gorge Rd	10	A	A
SR-125/Mission Gorge Rd	11	C	C
Fanita Dr./Mission Gorge Ave	12	C	C
Carlton Hills Boulevard/Mission Gorge Road Ave	13	D	C

The Project would not generate enough traffic to move intersections into unacceptable levels of service. Project ADT is small, traffic would be dispersed to a number of intersections in the area, and the number of peak hour trips would therefore be too small to affect traffic LOS. As such, impacts to roadway intersections would be less than significant.

The Project would not conflict with existing congestion management programs because the level of traffic it would generate would not result in unacceptable levels of service as defined in the City of Santee General Plan. As such, impacts would be less than significant.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

☐
☐

X

☐

The Project would not affect air traffic patterns because it would not build structures higher than what is allowed by the City of Santee Zoning Ordinance for this area. Additionally, the Project is located within a review area for Gillespie Field, according to the Gillespie Field Airport Land Use Compatibility Plan, dated 12/10/2010 (San Diego, 2010). The ALUCP evaluates seven criteria to evaluate whether or not the project is in a review area of the airport. Each area is accompanied by an exhibit that maps the various review areas.

(1) Section 3.3.3 of the ALUCP discusses noise impacts. According to Exhibit III-1 of the ALUCP,



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

the Project site is outside any zone that experiences noise impacts from the airport. Therefore, no review is necessary and there is no impact.

(2) Section 3.3.4 discusses safety. According to Exhibit III-2, the site is not within one of the six safety zones of concern. Therefore, no review is necessary and there is no impact.

(3) Section 3.5 evaluates airspace protection compatibility. According to Exhibit III-3 of the ALUCP, the Project site is within the Federal Aviation Administration (FAA) Height Notification Boundary, which requires notification of the FAA if a project exceeds thresholds established by 14 Code of Federal Regulations Part 77, Subpart B. To exceed the threshold, the Project would be required to either (a) be in excess of 200 feet in height, or (b) present a surface extending 100 feet outward and one foot upward (a 100:1 slope) from the runway elevation. The maximum building height proposed by the Project would be 35 feet. Allowing for antennas and other roof-top structures, the Project would not exceed criterion (a). The airport is at an elevation of 387 feet and the Project site is at a maximum elevation of 336 feet. Therefore, the Project would not create a surface with a 100:1 from the airport elevation. Neither criteria of Part 77 is exceeded, and no notification is required and impacts would not be significant.

(4 and 5) Section 3.6 examines airport overflight compatibility issues. The Project site is within the Airport Notification Area of the airport, as shown in Exhibit III-4. It is also within Review Area 2 of the Airport Influence Area (AIA) as shown on Exhibit III-5. Therefore, the Project is required to notify prospective buyers of the proximity of the airport with the following notice using provisions of the California Real Estate Transfer Disclosure:

NOTICE OF AIRPORT IN VICINITY: This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine



Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------	----------------------------------------------------	------------------------------	-----------

whether they are acceptable to you.

(6) The Project site is not within an aviation easement area, as shown on Exhibit III-6. Therefore, no easement is required and there are not impacts.

(7)The Project is within the Overflight Notification Area, also depicted on Exhibit III-6. According to Section 3.6.3 of the ALUCP, an Overflight Notification document would be required to be recorded for City of Santee approval of the Project. The text of the notification is provided in the preceding paragraph.

The Project would comply with Federal and State law with respect to the notification requirement by including the above notification process as a condition of the Project's final map approval. Compliance with these notification requirements would address the AIA and Overflight Notification Area requirements for Gillespie Field. As such, impacts would be less than significant and no mitigation would be required.

- |    |                                                                                                                                                     |                          |                          |                          |   |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|---|
| d) | Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|---|

The Project design, shown in Figure 2, Site Plan, would meet all City of Santee requirements for intersection design. The plan restricts Project access to a point on E. Heaney Circle, which is the least traveled of the streets adjacent to the site. The distance from the access point to existing intersections is approximately 175 feet. E. Heaney Circle, north of the access point, is a straight street with little vegetation, thereby providing a visual corridor for drivers. The proposed use, residential development, is compatible with the existing residential neighborhood. As such, there would be no impact.

- |    |                                        |                          |                          |                          |   |
|----|----------------------------------------|--------------------------|--------------------------|--------------------------|---|
| e) | Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | X |
|----|----------------------------------------|--------------------------|--------------------------|--------------------------|---|

The Project would construct its access to meet fire department regulations for fire truck access for a cul de sac, including street width, hydrant location, and turn-around space for a fire truck. As such, there would be no impact.

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f)	<p>Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</p> <p>The Project would not affect policies, plans, or programs for multi-modal facilities. Due to its location adjacent to existing commercial uses, it is expected to enhance pedestrian activity in the immediate area. As such, there would be no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
<b>XVII. UTILITIES AND SERVICE SYSTEMS --</b>					
Would the project:					
a)	<p>Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</p> <p>The Project would obtain wastewater service from the Padre Dam Municipal Water District (PDMWD). Wastewater from the Project site would be conveyed to the District's Water Recycling Facility (WRF). Pursuant to Section 402 of the Clean Water Act, the District is subject to the National Pollutant Discharge Elimination System (NPDES) permit program. The District applied for a waste discharge permit from the San Diego Regional Water Quality Control Board, which was granted as part of R9-2015-0002, which sets forth discharge requirements applicable to all PDMWD facilities (CRWQB, 2015). Accordingly, Order No. R9-2015-0002 requires the PDMWD to operate the WRF in compliance with all applicable waste discharge requirements and the Project's contribution of wastewater to the WRF would not have any potential to exceed treatment requirements of the San Diego Regional Water Quality Control Board. Therefore, there would be no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b)	<p>Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p> <p>The Project would obtain water and sewage services from the PDMWD. The PDMWD has indicated that it can and will serve the Project (see Attachment G). These service letters are included as part of the Project submittal. The Project would not trigger expansion of existing District facilities, as indicated in the letter. Therefore, there would be no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p> <p>All storm water on-site would be directed to the bioretention basin via a curb gutter system and 6" PVC pipes that would be constructed as part of the Project. The bioretention basin would treat the storm water before releasing the runoff into the existing storm drain system via an 8" PVC pipe that would be constructed as part of the Project. Although the basin is designed to capture a majority of the storm water runoff, there would be a slight increase in runoff leaving the site (approximately 1.2 cfs during the 100-year storm). The existing 42" CMP in East Heaney Circle would have the capacity to convey the increased runoff from the Project site. No off-site improvements are proposed.</p> <p>The installation of the facilities described above is considered to be part of the Project's construction phase and are evaluated throughout this Initial Study accordingly. In addition, the Project has no potential to result in the need for new or expanded storm water drainage facilities, beyond those facilities that are described herein and evaluated throughout this Initial Study. Further, Project-related drainage would not exceed the capacity of any existing or planned storm water drainage facilities. As such, impacts would be less than significant..</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
<p>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? In making this determination, the Lead Agency shall consider whether the project is subject to the water supply assessment requirements of Water Code Section 10910, et. seq. (SB 610), and the requirements of Government Code Section 664737 (SB 221).</p> <p>The Project would obtain water service from the PDMWD, which is a member of the County Water Authority and Metropolitan Water District, which assures access to imported water. The District indicated it can serve the Project. The service letter is included as part of the Project submittal (see Attachment G). Therefore, there would be no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Issues:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	<p>Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</p> <p>The PDMWD provides wastewater services for the City of Santee and will serve the Project (see Attachment G). The Project would obtain sewage service from the District, which has indicated it can serve the Project. The service letter is included as part of the Project submittal (see Attachment G). Therefore, there would be no impact.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
f)	<p>Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</p> <p>The City is served by the Sycamore Landfill, 8514 Mast Boulevard, for solid waste disposal. Based on the daily waste generation factor of 4 pounds of waste per multi-family dwelling unit obtained from CalRecycle (CalRecycle, n.d.), long-term operations of the Project would generate approximately 40 pounds of solid waste per day. During long-term operation, solid waste generated by the Project would represent approximately .0004% of the daily disposal capacity at the Sycamore Landfill. As such, the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacity at the Sycamore Landfill; therefore, impacts would be less than significant.</p>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Hauling of solid waste in Santee is handled by Waste Management of San Diego, a commercial enterprise. The company operates under a contract with the City and is required by the City to comply with all federal, state, and local statutes and regulations. In addition, the Project would be required to comply with Municipal Code provisions that are intended to ensure compliance with federal, state, and local statutes and regulations related to solid waste. Specifically, the Project would be required to comply with Santee Municipal Code Chapter 13.36, Solid Waste Management, which relates to all aspects of solid waste transport and disposal, including the requirement of providing separate bins to allow residents to separate recyclable materials from refuse. In addition, the Project would be required to comply with Chapter 13.38, Construction and Demolition Debris Recycling, which requires the recycling of construction debris to divert building materials from landfills and conserving natural resources. The Project would be required to comply with all applicable solid waste statutes and regulations; as such, there would be no impact.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE --**

- |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                          |   |                          |                          |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|---|--------------------------|--------------------------|
| a) | Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | X | <input type="checkbox"/> | <input type="checkbox"/> |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|---|--------------------------|--------------------------|

The Project site does not contain habitats that support substantial plant or animal communities. The small 0.48-acre site is surrounded by development and is fenced, therefore no significant wildlife range and movement through the site is not present. There are no historical resources on the site. While archaeological resources are not expected, should any be found during grading or construction, activity in the area will cease and the City of Santee will be notified in conformance with mitigation called for in Section V b). Impacts would be less than significant with adoption of these measures.

- b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals? ☐ ☐ ☐ X

The Project has minimal effects in both the short- and long-term. In the short-term, ten residences would be provided, traffic levels would increase slightly, and temporary noise effects from construction would be created. Superior drainage and runoff facilities would be installed, and the General Plan would be updated for the immediate area to allow for a residential use that is consistent with existing surrounding uses. In the long-term, these positive effects would remain relevant because drainage facilities would be maintained and the consistency of uses within the immediate community would remain. Environmental advantages of this location, such as proximity of commercial and public services, medium density residential use in an already developed area, and the location of development on an infill rather than an outlying property will accrue benefits to the environment on a long-term basis. As such, no impact would occur.

- c) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.) ☐ ☐ X ☐

A review of other recently completed, approved, or proposed projects in Santee was reviewed for cumulative impacts. The list of projects is attached (see Attachment K, Cumulative Projects List). The location of the projects on a City of Santee land use map is shown on Figure 9, Cumulative Projects.

Aesthetics:

Aesthetically the Project does not result in cumulative impacts because there are no projects within the view of the Project site. Therefore, the immediate views would not be impacted by cumulative projects in the study area. Projects in the study area are proposed on developed land, or adjacent to development. Therefore, the cumulative projects would reinforce existing visual impressions of commercial or residential development in the study area.

Agricultural Resources:

There are no agricultural resources on the Project site. As such, the Project would not contribute to a cumulative effect.

Air Quality:

As discussed in Section III.c, the Project is consistent



with the AQMP and RAQS because the Project in addition to the other projects would not exceed growth projections for the City. The Project combined with other projects within the 10-20 du/acre density range (R7 and R14) would represent 201 units (10 + 191), which is significantly less than the 728 units forecasted by the RHNA and SANDAG. As such, 201 units would accommodate projected growth rather than stimulate new unanticipated growth in the City. Therefore, given the Project's and other projects' consistency with the AQMP and RAQS, the Project would not be cumulatively significant as it relates to air quality.

#### Biological Resources:

The Project does not have a significant effect on biology. Other projects within a mile of the site (numbers 4, 5, 6, 8, 15, 21, 22, and 24) are also proposed on or adjacent to already developed areas. Large projects are required to assess biological impacts and mitigate impacts. They are also assessed in relation to the City of Santee MSCP, which is in the process of being approved. Given the lack of a project-level impact, the avoidance of streams and lake areas by other projects, and the project level assessments of biology required by the City, there is no cumulative effect.

#### Cultural Resources:

The Project has a potentially significant impact on cultural resources, and monitoring is required in the event artifacts are found during grading to reduce this impact to a less than significant level. Should artifacts be found they would be recorded and/or curated, so that further study can occur. Other projects in the area are subject to CEQA and City of Santee regulations as related to cultural resource evaluation and so any individual project would be required to mitigate its significant effects. Cumulative impacts are not significant because the Project would mitigate its potential impacts on cultural resources (any artifacts found would be curated, allowing for further study), and other projects in the area would be required to provide mitigation if any resource is potentially present.

#### Geology and Soils:

The Project does not have geology/soils impacts. All projects are assessed for appropriate geologic conditions. Earthquake risk is present throughout Southern California, and all projects are required to incorporate CBC requirements to minimize hazards due to earthquake. As such, projects would be assessed on an individual level and required to comply with all applicable CBCB requirements; therefore,

there would be no cumulative impact.

#### Greenhouse Gas Emissions:

Greenhouse gasses were assessed. The Project does not exceed screening level thresholds for greenhouse gases and therefore does not contribute to a cumulative effect. All projects are assessed against RHNA and 2050 RTP/SCS plans to reduce cumulative greenhouse gas emissions, as discussed in Section VII b. The Project, in conjunction with other cumulative projects, does not have a cumulative effect because it did not exceed the 900 MT project-level screening.

#### Hazards and Hazardous Materials:

No hazardous materials were found in relation to the Project site. Fire hazard is a region-wide hazard that is addressed in the City of Santee through a range of measures, including fire safe construction, limited building zones, and controls on landscaping (such as irrigation systems and avoidance of vegetation with high flammability). The cumulative effect of the Project and other projects in the area is addressed through the City of Santee Fire Department, which provides services throughout the City. The Project, for example, is 0.3 miles from a fire station. Mutual aid agreements between the City of Santee and other jurisdictions with firefighting resources are also in place in the City. Cumulative effects are therefore addressed by individual measures for each project, maintenance of the City's Fire Department, and recourse to other firefighting resources in the region. As such, cumulative impacts are not significant.

#### Hydrology and Water Quality:

Hydrology impacts were not significant and City design standards would assure that surface water control measures are consistent with building codes and meet all Regional Water Quality Control Board requirements. Other projects in the study area are also required to conform to City and regional standards which by their nature are designed to control cumulative effects.

#### Land Use and Planning:

The approval of the General Plan Amendment, which is part of the Project approval, would not have a significant impact on land use and planning. One other project on the cumulative project list, number 20, also proposed a General Plan Amendment. The Santee School District proposed and received approval for a change for 5.06 acre area at 10335 Mission Gorge Road, a vacant lot that is the site of a closed school. The land use designation would change from Park/Open Space (P/OS) to General Commercial (GC). The land use change would make use of land no

longer needed by the school district and as such would allow redevelopment to augment existing uses in the area.

The Project was assessed in relation to land use conflicts with Gillespie Field Airport. The Project would have no significant impacts. All projects' relationships to the airport are intensively assessed on a case by case basis using seven criteria, which are expressed through a series of maps that plot impact zones. These measures include design, visibility, aviation, and noise. Projects are not approved unless they conform to these measures. The closer a project is to the airport, the greater the restrictions that are applied. Therefore, due the lack of Project impacts, and the assessment that is applied to all projects in the City of Santee, cumulative impacts would be less than significant.

#### Mineral Resources:

The Project would not have any impacts on mineral resources because it has no minable deposits. Therefore, it does not contribute to a cumulative effect.

#### Noise:

Noise is generated during construction and operation of a project. The proposed Project would not have a significant noise impact. The closest other project is number 8, approximately 0.5 mile to the south. That project is under construction now, so the construction cycles of the two projects would not overlap. There are no other projects near the Project site; therefore, if simultaneous construction were to occur, there would be no cumulative effect created by the Project.

Operationally the Project does not have a noise impact due to its type of use. Therefore, the Project would not contribute to a cumulatively significant cumulative noise effect during operation. As such, cumulative noise impacts are not significant.

#### Population and Housing:

The Project augments the housing stock in the City of Santee, but does not exceed the City's projected growth. Cumulative projects consist of a range of uses that would be expected, including mobile homes, 5 single family residential, 6 multi-family residential, 3 industrial projects, 7 commercial projects, and a park. While additional residential opportunities of all types are being created, the projects are not exclusively focused on residential, which could lead to an excess of population growth in the area. Projects are located on vacant lots or in already developed areas, which represents a minimal disruption to existing housing and populations. Due to the lack of project-level

impacts and the broad range of cumulative project uses, cumulative population and housing impacts are not significant.

Public Services and Recreation:

The use of public services has been examined for all cumulative projects. Service letters for key services are required from each project proposed, and when new facilities are triggered, these are required as a condition of approval of the projects. Fees are also collected to provide on-going support for public service providers. This ensures public services are provided concurrently with construction. The Project has obtained letters from key service providers in conformance of this requirement, and would be required to pay fees to schools and for park usage. The Project would not contribute to a significant impact on parks. Some other residential projects are larger, but would pay a commensurately higher level of fees in support of parks. Santee offers park/recreation system with 29 facilities that are dispersed throughout the city, as shown on their web page (<http://ci.santee.ca.us/index.aspx?page=174>). Projects' effects on the park system is therefore dispersed, so that no one facility would be overwhelmed by the results of these cumulative projects. Due to the requirement for service letters from service providers and fees charged for service, and the extensive park system, cumulative impacts are not significant.

Transportation and Traffic:

Transportation and traffic effects of the Project would not be significant. Projects must be in conformance with the City's General Plan Circulation Element, which currently is in the revision stage. Policy 1.1 states that "The City shall provide integrated transportation and land use decisions that enhance smart growth development served by complete streets, which facilitate multimodal transportation opportunities." City policy requires that all large projects assess their traffic impacts, and any drop in the Level of Service below D requires mitigation. Preliminary work has identified all streets and transportation that operate at Levels E or F, and no project can put additional traffic onto those roads without full mitigation for impacts, and/or overriding considerations. The Project would not contribute to a significant project-level impact, and projects in the cumulative study area must assess their traffic impacts and mitigate them. No projects are permitted to impact roadways at already unacceptable levels unless they mitigate all impacts to the greatest extent possible. As such the Project, in conjunction with cumulative projects, would not have significant cumulative effect.

Utilities and Service Systems:

The need for utilities has been examined for all cumulative projects. Projects would be expected to require water, sewer, drainage, solid waste, gas and electric utilities, as well as communication and cable services. Service letters for water and sewer services are required from each project that is proposed. These list improvements that are required, which typically are made a project condition of approval. Fees are also collected to provide on-going support for water and sewer service, which ensures these utilities are provided concurrently with construction. The Project has obtained letters from key service providers in conformance to this requirement, and will pay fees for water and sewer hook-up. Drainage is handled on a project by project basis through project design, in conformance with State of California and City of Santee regulations. Solid waste is provided on a fee basis to new customers, and as such is available to all projects in the area when they are operational. A Sycamore Land Fill, with a stated capacity of 39 million cubic yards, can meet the needs of cumulative projects and the City as a whole. San Diego Gas and Electric (SDGE) maintains an extensive gas and electricity grid system in the region. The system is periodically upgraded to keep up with demand. Fees are assessed when end users hook up to the system. Communication services are readily available in the region, through a number of wired and wireless providers, including AT&T, Cox, and T-Mobile. These services are fee for service providers and are available to any end-user in the City. There are several cable providers in Santee, among them Time Warner, AT&T, Direct TV, Cox, and Satellite Television. These services are fee for service providers and are available to any end-user in the City. Typically new projects provide hook-ups for all utilities as a part of their design. In summary, cumulative impacts to utilities are not significant because projects obtain service letters for key services, which ensures facilities are available commensurate with need. Extensive systems for gas, electric, communications and cable are operational in Santee and are available on a fee basis. In all cases fees are collected to fund continued operation of utility providers. Cumulative impacts would not be significant.

- d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? ☐ ☒ ☐ ☐

The Project has some environmental effects but these impacts would be less than significant. The Project site is within the Gillespie Field AIA, requiring notification of potential buyers of this fact. Mandatory

compliance with notification requirements would ensure impacts would be less than significant. The Project is not within a primary flight zone and the noise contours for the Project are below 60 dB CNEL, which is not within an impact category. Aesthetic considerations require architectural and landscaping plans that are consistent with residential structures with similar densities that already exist in the area. Air quality is not expected to be affected by Project operations. Air quality impacts would occur during construction related activities, such as dust during grading; however, these impacts would be reduced by mandatory compliance with applicable City regulations including the use of watering, straw wattles, ground cover, and a construction management plan that would monitor grading activities on windy days.

Cultural resources are not expected to exist on the Project site, but should any resources be found, grading would be stopped and the City would be notified in accordance with mitigation proposed for the Project in Section V b). Earthquake risk is present throughout southern California. To address this risk, the geotechnical analysis for the Project recommends structures and improvements to be designed using Site Class D of the CBC. The grading plan for the Project would also account for and address the expansive soils on the site.

Greenhouse gas emissions would be reduced by the Project location that is within walking distance of numerous commercial uses and services. Further, reductions are achieved by the Project design through the use of sustainable construction methods and materials. Hydrologic design for runoff will conform to City of Santee and Regional Water Control Board requirements. Noise effects from construction will be governed by and minimized by the City of Santee's ordinance that regulates noise levels, duration, and timing for construction equipment. Use of noise reducing construction materials in accordance with the CBC and City regulations would also reduce potential noise effects due to traffic. While the Project would generate traffic, 80 ADT would not affect the service levels of nearby street segments or intersections and current congestions management plans would not be affected. In summary, the Project would have a less than significant effect on the environment.

Traffic impacts were evaluated and found to be not significant because the Project would not cause road segments or intersections to function at unacceptable LOS levels. Fire, school, public services, utilities and trash removal services are available to the Project and therefore the Project would not expose human beings to dangers or risks from the lack of these services.



**REFERENCES**

The following reports, studies, supporting documentation, and persons consulted were used in the preparation of this MND.

Boyle, Lt. Anthony. Santee Police Department. Phone correspondence with Courtney Davis. September 28, 2016.

California Department of Conservation (CDC). 2014. *California Farmland Conversion Report 2012-2014*. Web. Available: [ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sdgl4\\_w.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sdgl4_w.pdf). Accessed January, 21, 2017.

California Department of Resources Recycling and Recovery (CalRecycle). N.d. Solid Waste Information System (SWIS)- Sycamore Landfill. Web. Available: <http://www.calrecycle.ca.gov/SWFacilities/Directory/37-AA-0023/Detail/>. Accessed January 21, 2017.

California Regional Water Quality Control Board, San Diego Region. (CRWQB). 2015. Order No. R9-2015-0002. Web. Available: [http://www.waterboards.ca.gov/sandiego/board\\_decisions/adopted\\_orders/2015/R9-2015-0002.pdf](http://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0002.pdf). Accessed January, 21, 2017.

Kerl, Bruce. Santee Fire Department. Phone correspondence with Courtney Davis. September 23, 2016.

San Diego, County of. 2010. *Gillespie Field Airport Land Use Compatibility Plan*. Web. Available: [http://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core\\_Download&EntryId=2984&language=en-US&PortalId=0&TabId=225](http://www.san.org/DesktopModules/Bring2mind/DMX/Download.aspx?Command=Core_Download&EntryId=2984&language=en-US&PortalId=0&TabId=225). Accessed January 21, 2017.

SANDAG. 2011. *Regional Housing Needs Assessment Plan*. Web. Available: [http://www.sandag.org/uploads/publicationid/publicationid\\_1661\\_14392.pdf](http://www.sandag.org/uploads/publicationid/publicationid_1661_14392.pdf). Accessed January 21, 2017.

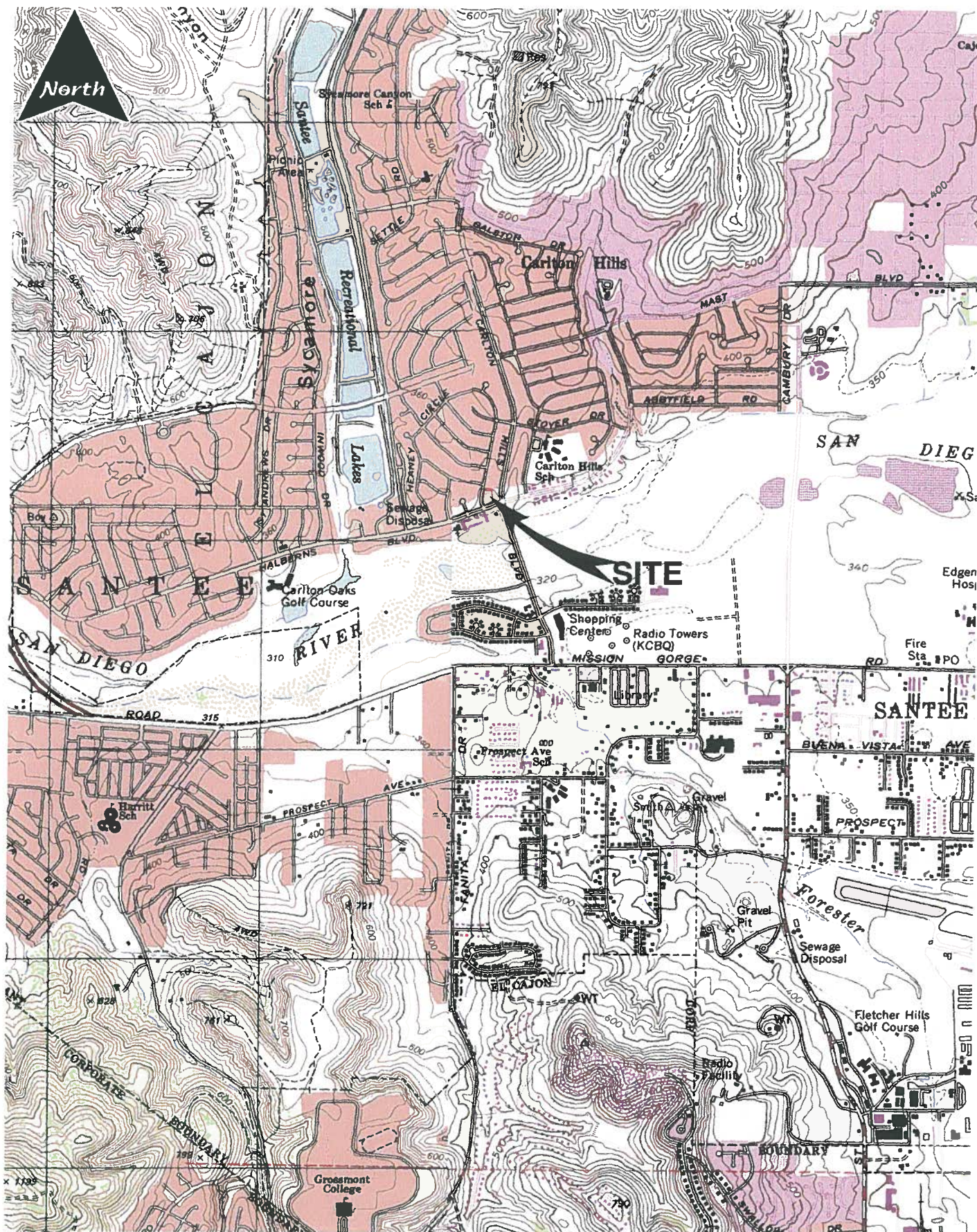
Santee, City of. 2003. City of Santee General Plan. August 2003. Web. Available: [www.ci.santee.ca.us/Modules/ShowDocument.aspx?documentid=542](http://www.ci.santee.ca.us/Modules/ShowDocument.aspx?documentid=542). Accessed January 21, 2017.

Santee, City of. 2016. *City of Santee Municipal Code*. Web. Available: <http://qcode.us/codes/santee/>. Accessed January 21, 2017.

**DOCUMENTS APPENDED TO THIS MND**

Attachment A	Birdseye Planning Group. Air Quality Assessment Report. September 21, 2016.
Attachment B	Alden Environmental, Inc. Biology Report. February 24, 2016.
Attachment C	Helix Environmental Planning. Cultural Resources Survey Report. April 20, 2016.
Attachment D	San Diego Natural History Museum. Paleontological Resource Assessment. July 28, 2016.
Attachment E	Geocon, Inc. Geotechnical Investigation. April 8, 2015.
Attachment F	Birdseye Planning Group. CalEEMod Calculations. May 25, 2015.
Attachment G	City of Santee. Project Facility Availability Forms. June 2016.
Attachment H	Polaris Development Consultants, Inc. SWQMP. January 2017.
Attachment I	Birdseye Planning Group. Noise Report. June 1, 2016.
Attachment J (1)	Service Letter Santee School District. April 8, 2016
Attachment J (2)	Service Letter Grossmont Union High School District. April 11, 2016.
Attachment K	Cumulative Projects List. July 2016.







# **Santee Townhomes**

## **Mitigated Negative Declaration**

**CASE FILES: GPA2014-4, R2014-2, TM2014-2, DR2014-7, AEIS2014-14**

**The complete document, including Appendices  
A through K can be found on the City of Santee  
Website:**

**[www.cityofsantee.ca.gov](http://www.cityofsantee.ca.gov)**

**Listed under “News and Information –  
Project/Environmental Review”**



***Preserve Wild Santee***

April 24, 2017

Mr. Michael Coyne  
City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071  
mkush@ci.santee.ca.us

**RE: Santee Townhomes Draft Mitigated Negative Declaration (MND) / Initial Study (IS)**

Dear Mr. Coyne,

The project proposes a General Plan Amendment, yet fails to do proper analysis, disclosure, avoidance and mitigation for the significant adverse impacts of that action.

The Santee General Plan is Santee's highest land use law, yet the MND considers failure to adhere to or comply with the General Plan as inconsequential. To the contrary, routine introduction of inconsistencies with the General Plan and the underlying environmental analysis upon which it is based undermines the foundation of the interconnected elements resulting in significant adverse and unmitigated environmental impacts for residents. The current traffic problem that plagues the city is just one example of the consequence of similar prior inconsistent actions.

The parcel is zoned Neighborhood Commercial (NC). (NC) has the potential to eliminate vehicle trips by making alternative modes of travel viable in space and time. (NC) has the potential to shorten vehicle trips by providing viable options to more distant and impacted commercial areas. Additional (NC) can also be beneficial for adjacent already existing (NC) by providing residents opportunities to complete multiple shopping tasks in the same vicinity without use of an automobile. These benefits are built into our current General Plan. Conversion from (NC) would result in significant adverse cumulative impacts to traffic circulation and climate change.

This action is proposed within the information vacuum that exists because the city has failed to complete an effective Climate Action Plan. CEQA Guideline Section 15183.5 requires adoption of a climate action plan.

The project must analyze and disclose the significant impacts of the proposed land use conversion in a full Environmental Impact Report, yet fails to do so.

Without providing any substantiating evidence, the Initial Study concludes in regard to (NC), "this type of use has become less likely over time because the area has been developed with residential uses to the north, south, and west." To the contrary, the corner market directly adjacent to the project site has proven (NC) to be viable and the other nearby residential development provides a source of potential customers for (NC) on the parcel within walking distance. The conclusions within the MND relating to viability of (NC) and compatibility with nearby residential uses are erroneous and without substantial evidence.

What are the GHG impacts of the project? What are the GHG impacts of a conversion of (NC) to Medium-High Residential (R14)?

What are the aesthetic impacts to adjacent property owners and how will three-story buildings impact the solar production capacity of those residents? The project not only fails to avoid GHG impacts by producing solar power, but may preclude its neighbor/s from offsetting GHG emissions with solar power in part or in whole as well. These are significant adverse environmental impacts that have not been considered, avoided or mitigated to a level of insignificance.

The project also has cumulatively significant impacts to General Fund revenue. Residential development creates demand for services that are not covered by property tax revenue collected. Continued actions to replace commercial development, which is a net generator of revenue, with residential development, which is a net loser, puts the long-term fiscal health of the city in question. Infrastructure that residential development demands must be maintained long-term and the demand for services never goes away.

### **GHG Mitigation**

If the project is approved, any units built should utilize the full productive capacity of each roof for PV Solar or commit to a minimum 4Kw system on each unit (approximately 14 panels) with "battery wall" storage and install Level 2 Electric Vehicle charging stations in each garage. This should allow energy conscious families to significantly offset power demand and at least partially fuel an EV with clean power. SB 350 requires "widespread electrification of transportation." The current climate crisis requires nothing less.





## Addressing Climate Change is Urgent and Must be Considered at the Level of Individual Projects

The project emits GHGs directly and encourages the continued burning of fossil fuels indirectly that moves us collectively toward an inhabitable planet. Action to address climate change becomes ever more urgent with each passing day.<sup>1</sup> Even meeting state mandates is not enough to avoid severe climatic impacts, which is why individual projects should be designed to be GHG neutral.<sup>2</sup> **Every avoidable emission increases the severity of the problem as we accelerate toward tipping points where the damage becomes increasingly severe, irreversible and uncontrollable.**<sup>3</sup>

In recent decades civilization has placed its foot to the floor of a sluggish climate accelerator. Now strong collective adverse action is kicking in, but we are applying little more than a parking brake to the GHG accelerator as government policy appears blinded to the cliff of unalterable climate forcing already in the pipeline.<sup>4</sup>

---

<sup>1</sup> "Humanity today, collectively, must face the uncomfortable fact that industrial civilization itself has become the principal driver of global climate. If we stay our present course, using fossil fuels to feed a growing appetite for energy-intensive life styles, we will soon leave the climate of the Holocene, the world of prior human history. The eventual response to doubling pre-industrial atmospheric CO<sub>2</sub> likely would be a nearly ice-free planet, preceded by a period of chaotic change with continually changing shorelines. Humanity's task of moderating human-caused global climate change is urgent... Continued growth of greenhouse gas emissions, for just another decade, practically eliminates the possibility of near-term return of atmospheric composition beneath the tipping level for catastrophic effects... The stakes, for all life on the planet, surpass those of any previous crisis. The greatest danger is continued ignorance and denial, which could make tragic consequences unavoidable." Hansen, James et al. "Target Atmospheric CO<sub>2</sub>: Where Should Humanity Aim?" NASA/Goddard Institute for Space Studies, 2008

<sup>2</sup> Hansen, James et al. "Target Atmospheric CO<sub>2</sub>: Where Should Humanity Aim?" NASA/Goddard Institute for Space Studies, 2008.  
<http://climate.nasa.gov/vital-signs/carbon-dioxide/>  
<http://climate.nasa.gov/evidence/>

<sup>3</sup> "Effects that scientists had predicted in the past would result from global climate change are now occurring: loss of sea ice, accelerated sea level rise and longer, more intense heat waves" (NASA Global Climate Change Vital Signs of the Planet). "...the net damage costs of climate change are likely to be significant and to increase over time."- Intergovernmental Panel on Climate Change  
<http://climate.nasa.gov/effects/>

<sup>4</sup> "Earth's response to climate forcings is slowed by the inertia of the global ocean and the great ice sheets on Greenland and Antarctica, which require centuries,



“Many aspects of climate change and associated impacts will continue for centuries, even if anthropogenic emissions of greenhouse gases are stopped. The risks of abrupt or irreversible changes increase as the magnitude of the warming increases.”<sup>5</sup>

The National Oceanic and Atmospheric Administration (NOAA) and National Aeronautics and Space Administration (NASA) confirmed that 2014 was the hottest year ever recorded. (NASA 2015.) Heat in 2015 then exceeded 2014 and 2016 exceeded 2015. In the National Climate Assessment released by the U.S. Global Change Research Program, experts make clear that “reduc[ing] the risks of some of the worst impacts of climate change” will require “aggressive and sustained greenhouse gas emission reductions” over the course of this century. (Melillo 2014.) Indeed, humanity is rapidly consuming the remaining “carbon budget” necessary to preserve a likely chance of holding the average global temperature increase to only 2°C above pre-industrial levels. According to the IPCC, when non-CO<sub>2</sub> forcings are taken into account, total cumulative future anthropogenic emissions of CO<sub>2</sub> must remain below about 1,000 gigatonnes (Gt) to achieve this goal.<sup>6</sup> Leading scientists—characterizing the effects of even a 2°C increase in average global temperature as “disastrous”—have prescribed a far more stringent carbon budget for coming decades. (Hansen 2013.) Climate change will affect California’s climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability.

---

millennia or longer to approach their full response to a climate forcing. This long response time makes the task of avoiding dangerous human alteration of climate particularly difficult, because the human-made climate forcing is being imposed rapidly, with most of the current forcing having been added in just the past several decades. Thus, observed climate changes are only a partial response to the current climate forcing, with further response still ‘in the pipeline’.”

Hansen, James et al. “Climate sensitivity, sea level and atmospheric carbon dioxide”, The Earth Institute, Columbia University, NASA Goddard Institute for Space Studies, 2013, p. 2.

<sup>5</sup> Intergovernmental Panel on Climate Change, “Climate Change 2014 Synthesis Report Summary for Policymakers,” page 16.

<sup>6</sup> IPCC 2013 (“Limiting the warming caused by anthropogenic CO<sub>2</sub> emissions alone with a probability of >33%, >50%, and >66% to less than 2°C since the period 1861–1880, will require cumulative CO<sub>2</sub> emissions from all anthropogenic sources to stay between 0 and about 1570 GtC (5760 GtCO<sub>2</sub>), 0 and about 1210 GtC (4440 GtCO<sub>2</sub>), and 0 and about 1000 GtC (3670 GtCO<sub>2</sub>) since that period, respectively. These upper amounts are reduced to about 900 GtC (3300 GtCO<sub>2</sub>), 820 GtC (3010 GtCO<sub>2</sub>), and 790 GtC (2900 GtCO<sub>2</sub>), respectively, when accounting for non-CO<sub>2</sub> forcings as in RCP2.6. An amount of 515 [445 to 585] GtC (1890 [1630 to 2150] GtCO<sub>2</sub>), was already emitted by 2011.”). *See also* UNEP 2013 (describing emissions “pathways” consistent with meeting 2°C and 1.5°C targets).



California has a mandate under AB 32 to reach 1990 levels of greenhouse gas emissions (“GHG”) by the year 2020, equivalent to approximately a 30 percent reduction from a business-as-usual projection. Health & Saf. Code § 38550. The state must also reduce emission levels to 80 percent below 1990 levels by 2050. (Executive Order S-3-05 (2005).) In enacting SB 375, the state has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.<sup>7</sup>

In 2015, Governor Brown issued Executive Order B-30-15 requiring greenhouse gas emissions to be 40% below 1990 levels by 2030.<sup>8</sup> The most recent legislative session passed SB 350, which requires widespread electrification of the transportation sector, half of all power generated to be from renewable sources, and a doubling of energy efficiency in buildings.

The state Legislature has found that failure to achieve greenhouse gas reduction would be “detrimental” to the state’s economy. Health & Saf. Code § 38501(b). In his 2015 Inaugural Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- Increase electricity derived from renewable sources to 50 percent;
  - Reduce today’s petroleum use in cars and trucks by 50 percent;
  - Double the efficiency of existing buildings and make heating fuels cleaner.
- (Brown 2015 Address.)

Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. *Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin.*, (9th Cir. 2008) 538 F.3d 1172, 1217 (“the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis” that agencies must conduct). One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California’s climate as a whole. Similarly, CEQA requires that an EIR consider both direct and indirect impacts of a project. CEQA Guidelines, § 15064.

---

<sup>7</sup> See <http://www.arb.ca.gov/cc/sb375/sb375.htm>.

<sup>8</sup> Marin County has demonstrated the feasibility of state GHG reduction targets. Marin achieved a 15% below 1990 levels by 2012 – eight years ahead of schedule and set a new aggressive target of 30% below 1990 levels by 2020. <http://www.marincounty.org/main/county-press-releases/press-releases/2015/cda-climateaction-111015>



## **Additional Mitigation is Needed to Address the Project's Significant GHG Impacts**

California, (with the exception of Texas) leads the nation in GHG emissions.<sup>9</sup>

An EIR should consider additional mitigation measures during construction and operation of the project that would lower the project's overall GHG emissions and contribution to climate change. The California Air Pollution Control Officers Association has identified existing and potential mitigation measures that could be applied to projects during the CEQA process to reduce a project's GHG emissions. (CAPCOA 2010). The California Office of the Attorney General also has developed a list of reduction mechanisms to be incorporated through the CEQA process. (California Office of the Attorney General 2010). These resources provide a rich and varied array of mitigation measures that should be incorporated into the revised project. Potential mitigation measures during operation of the project include, but are not limited to:

- Analyzing and incorporating the U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) or comparable standards for energy and resource-efficient building during pre-design, design, construction, operations and management.
- Designing buildings for passive heating and cooling, and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.;
- Designing buildings for maximum energy efficiency including the maximum possible insulation, use of compact florescent or other low-energy lighting, use of energy efficient appliances, etc.
- Reducing the use of pavement and impermeable surfaces;
- Requiring water reuse systems;
- Installing light emitting diodes (LEDs) for traffic, street and other outdoor lighting
- Limiting the hours of operation of outdoor lighting
- Maximizing water conservation measures in buildings and landscaping, using drought-tolerant plants in lieu of turf, planting shade trees;
- Ensure that the Project is fully served by full recycling and composting services;
- Ensure that the Project's wastewater and solid waste will be treated in facilities where greenhouse gas emissions are minimized and captured.
- Installing the maximum possible photovoltaic array on the building roofs and/or on the project site to generate all of the electricity required by the

---

<sup>9</sup> Magill, Bobby. "Texas, California Lead Nation in Carbon Emissions, Climate Central, October 29, 2015. <http://www.climatecentral.org/news>



- Project, and utilizing wind energy to the extent necessary and feasible;
- Installing solar water heating systems to generate all of the Project's hot water requirements;
- Installing solar or wind powered electric vehicle and plug-in hybrid vehicle charging stations to reduce emissions from vehicle trips.

Mitigation measures related to Project construction could include:

- Utilize recycled, low-carbon, and otherwise climate-friendly building materials such as salvaged and recycled-content materials for building, hard surfaces, and non-plant landscaping materials;
- Minimize, reuse, and recycle construction-related waste;
- Minimize grading, earth-moving, and other energy-intensive construction practices;
- Landscape to preserve natural vegetation and maintain watershed integrity;
- Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.

### **"Emissions Gap" and Importance of a Net Zero Energy Project**

Every GHG emission is now a cumulatively significant impact to climate. Certainly this project's emissions are significant. One reason is because of the large "Emissions Gap" between the projected results of current GHG reduction pledges and policies<sup>10</sup> versus the reductions required to hold the increase in average global temperature to 2 degrees Celsius above pre-industrial levels. (Even a 2°C increase will have catastrophic impacts).<sup>11</sup>

The severity of the gap is illustrated in Figure ES1: Historical greenhouse (GHG) emissions and projections until 2050 and Figure ES2: The Emission Gap (page 12). The current emission trend is illustrated in shaded gray, which corresponds to calamitous temperature increases. The shaded blue represents the substantial GHG reductions required to meet less severe temperature increases.

The upward Current Policy Trajectory line appears in yellow/gold in Figure ES2: The Emission Gap (pages 12 & 13).

<sup>10</sup> International GHG reduction commitments are termed Intended Nationally Determined Contributions (INDC). These are largely unsecured pledges that may or may not be enacted to reduce GHG emissions. <http://cait.wri.org/indc/>

<sup>11</sup> "Temperature increases beyond 1.0°C may elicit rapid, unpredictable, and non-linear responses that could lead to extensive ecosystem damage" Stockholm Institute, "Targets and Indicators of Climate Change" 1990. Also, <http://www.carbonbrief.org/two-degrees-the-history-of-climate-changes-speed-limit>





The gap is sufficiently wide that the Department of Defense is preparing a “Climate Change Adaptation Roadmap”. The foreword to the plan states:

“Rising global temperatures, changing precipitation patterns, climbing sea levels, and more extreme weather events will intensify the challenges of global instability, hunger, poverty, and conflict. They will likely lead to food and water shortages, pandemic disease, disputes over refugees and resources, and destruction by natural disaster in regions across the globe. In our defense strategy, we refer to climate change as a ‘threat multiplier’ because it has the potential to exacerbate many of the challenges we are dealing with today – from infectious disease to terrorism...Climate change is a global problem. Its impacts do not respect national borders. No nation can deal with it alone. We must work together...

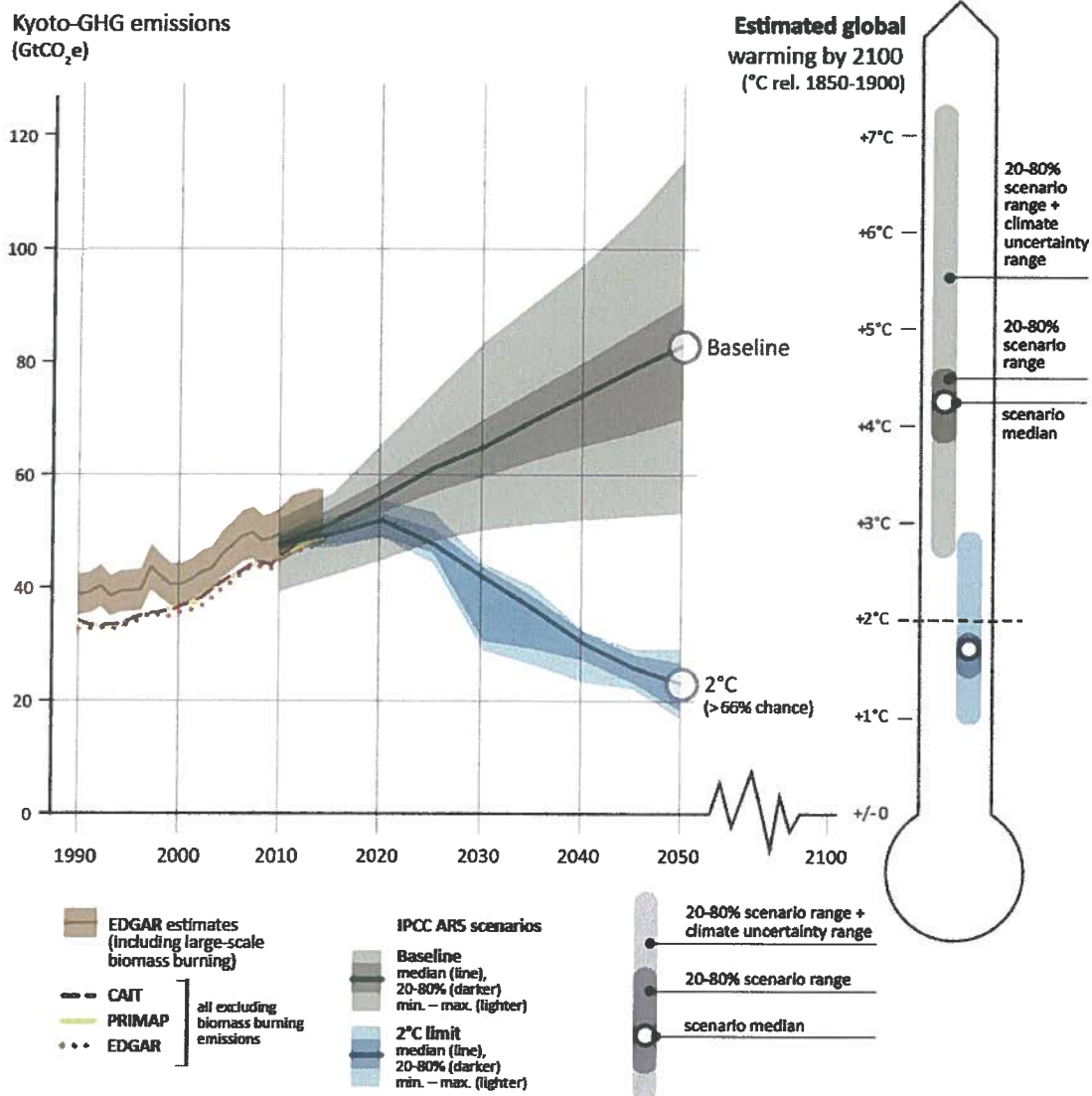
Secretary of Defense Chuck Hagel, Department of Defense  
2014 Climate Change Adaptation Roadmap



Former California Governor Arnold Schwarzenegger demonstrates a feasible mitigation measure to “terminate” GHG emissions.







**Figure ES1: Historical greenhouse (GHG) emissions and projections until 2050**

<sup>1</sup> Data for 2014 are available from EDGAR and PRIMAP, see Chapter 2.

<sup>2</sup> The six greenhouse gases covered by the UNFCCC/Kyoto Protocol — carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride. Here aggregated with 100-year Global Warming Potentials (GWPs) of the IPCC Second Assessment Report.

<sup>3</sup> Based on the final released IPCC AR5 scenarios database data.

**The severity of the gap is massive in both the size of emissions and in its consequences, which is why every GHG emission is a cumulatively significant adverse impact.**

Annual Global Total Greenhouse Gas Emissions (GtCO<sub>2</sub>e)

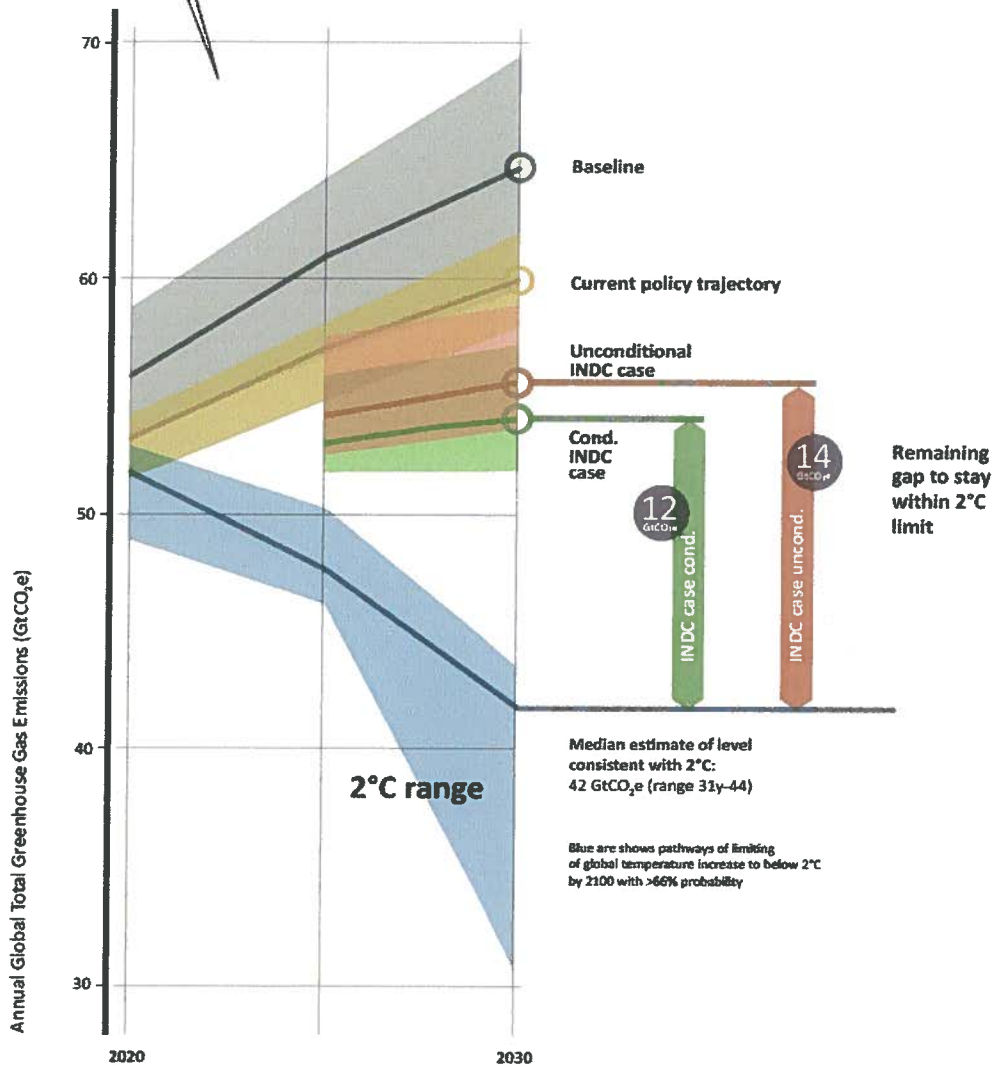
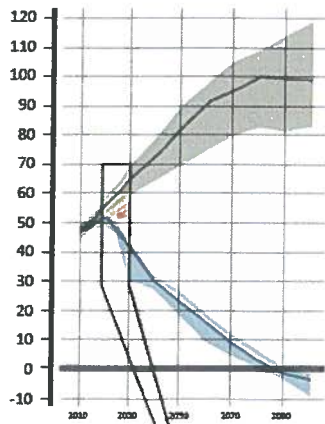


Figure ES2: The emissions gap





# CITY OF SANTEE

**MAYOR**  
John W. Minto

**CITY COUNCIL**  
Ronn Hall  
Stephen Houlahan  
Brian W. Jones  
Rob McNelis

April 25, 2017

Preserve Wild Santee  
9222 Lake Canyon Road  
Santee, CA 92071

**Re: Late Comment Letter Regarding the Santee Townhomes Draft Mitigated Negative Declaration/Initial Study**

Dear Mr. Collinsworth:

The comment letter received on April 24, 2017 regarding the Santee Townhomes Draft Mitigated Negative Declaration and Initial Study ("MND") was submitted nearly a month past the close of the MND's public review and comment period on March 27, 2017. CEQA does not require consideration of late comment letters. Regardless, the City provides the following response to the late comment letter:

**Consistency with the City General Plan**

The late comment letter incorrectly states that the proposed project is inconsistent with the City's General Plan because it proposes a General Plan Amendment to change the project site's land use designation from Neighborhood Commercial ("NC") to Medium-High Density Residential ("R14"). The R14 land use designation is consistent with the designation of existing parcels to the south and west of the project site. As explained in the MND, surrounding properties have been developed with residential uses, which are incompatible with the NC designation, and this compatibility issue is one reason the project site has remained undeveloped. (See MND, p. 34.) Upon issuance of the General Plan Amendment sought by the project applicant, no inconsistency between the proposed project and the site's underlying General Plan designation would exist. The MND also considered the proposed project's consistency with the City General Plan Conservation Element (MND, pp. 15, 34, 35), Safety Element (MND, pp. 23, 32), Noise Element (MND, p. 35), and Circulation Element (MND, pp. 43-44). These analyses indicate the proposed project is consistent with the General Plan.

The late comment letter also states that the MND must analyze and disclose the impacts of the proposed "land use conversion", which the City interprets as a request for analyzing and disclosing the impacts related to designating the project site R14. The MND does analyze the impacts of changing the designation from NC to R14, however in this instance CEQA does not

require (and does not allow) a “plan to plan” comparison, or a comparison of the impacts from a hypothetical NC project against the impacts of the proposed R14 project. Instead, CEQA requires that the MND analyze the impacts of the proposed project against the existing conditions baseline – which here, is a vacant site.

The late comment letter seems to imply that a change in General Plan designation on the project site will result in potentially significant traffic impacts. Traffic impacts were analyzed in the MND on pages 42 through 47. The MND determined that impacts relating to traffic would be less than significant. The comment letter does not point to any facts inconsistent with the MND’s determination.

Finally, the late comment letter challenges the statement in the MND that land uses originally envisioned for the NC land use designation have “become less likely over time because the area has been developed with residential uses to the north, south, and west.” The MND supports this statement with the fact that potential compatibility issues could arise from siting commercial uses adjacent to the residential uses that now are located to the north, south, and west. Regardless, the policy decision to change a land use designation and grant a General Plan Amendment is one left to the discretion of the decisionmaking body consistent with the goals and objectives of the General Plan.

#### **Analysis of Greenhouse Gas Emissions**

The late comment letter asks what the greenhouse gas impacts of the proposed project are. These impacts are discussed, analyzed, and disclosed in the MND on pages 24 through 26. The MND analyzes construction emissions and operational emissions, whether the proposed project will result in emissions with the potential to significantly impact the environment, and whether the proposed project conflicts with a plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases. The MND’s analysis determined, based on substantial evidence, that impacts would be less than significant because (1) project emissions would be less than the City’s recommended and preferred significance threshold of 900 metric tons of CO<sub>2</sub> equivalent per year, and (2) the project is consistent with SANDAG’s 2050 Regional Transportation Plan, Sustainable Communities Strategy, and SIP conformity statement. (MND, pp. 25-26.) The significance threshold of 900 MTCO<sub>2</sub>e is fairly conservative – several air quality management districts have adopted higher thresholds. For example, the South Coast Air Quality Management District recommends a threshold of 3,000 MTCO<sub>2</sub>e/year, and the Bay Area Air Quality Management District applies a significance threshold of 1,100 MTCO<sub>2</sub>e/year.

The MND’s analysis is consistent with the California Supreme Court opinion in *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204, which holds that consistency with an RTP/SCS and consistency with bright-line numerical thresholds (such as 900 MTCO<sub>2</sub>e/year) are valid methods to analyze the significance of potential impacts. The MND quantitatively identifies the emissions of the proposed project: 86 MTCO<sub>2</sub>e during construction, and 114.3 MTCO<sub>2</sub>e/year during operations. (MND, p. 25.) This constitutes substantial evidence supporting the MND’s determination that impacts are less than significant. The late comment letter does not point out any errors in the MND’s analysis.

The late comment letter does ask what the impacts “of a conversion of (NC) to Medium-High Residential (R14)” would be. As discussed above, CEQA does not allow a “plan to plan” comparison. However, even if the delta between emissions from a hypothetical NC development on the project site as compared to the proposed project were calculated, they would be less than the emissions identified in the MND. This is because the MND assumes that the project site currently emits no greenhouse gases at all.

Given that there are no potentially significant impacts from the project’s greenhouse gas emissions, CEQA does not require additional mitigation measures to further reduce these already less than significant impacts. Therefore, there is no legal nexus under CEQA to require that the suggested mitigation measures identified in the late comment letter, including a 4kw solar system, battery wall and Level 2 Electric Vehicle charging stations for each unit, be required for the proposed project. Nonetheless, the applicant has agreed to the following project conditions:

- The project shall include a roof-mounted solar photo-voltaic system to the maximum feasible extent given roof space.
- The garage for each dwelling unit shall be equipped with a dedicated 40A circuit and receptacle to support a future, plug-in, AC Level 2 electric vehicle charging station.
- The project shall include a rain harvesting system to collect and reuse rainwater for landscape irrigation.

#### **Analysis of Aesthetic Impacts**

The late comment letter asks what the aesthetic impacts of the proposed project will be to adjacent property owners, and impacts on the solar production capacity of adjacent residents. Aesthetic impacts are analyzed in the MND on pages 4 and 5 and were determined to be less than significant. The maximum height of the proposed townhomes of 34.3 feet and proposed placement of the buildings would not impact the ability of neighbors to install solar. The nearest residential building to the east, where a shadow from the proposed building would be cast during peak solar hours, is at least 90 feet away from the proposed building.

#### **Fiscal Impacts**

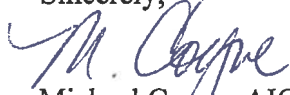
The late comment letter states that the proposed project has cumulatively significant impacts to General Fund revenue. This is incorrect. The parcel is currently vacant and is not generating General Fund revenue. The impacts associated with the proposed project on the provision of public services is analyzed in the MND on pages 39 through 41. This analysis determined that all impacts would be less than significant, given that the project only proposes 10 units, and is likely to generate only 29 residents. Regardless, fiscal, social, and economic consequences are not considered “impacts” pursuant to CEQA.

#### **No Environmental Impact Report is Required**

The late comment letter incorrectly states that an environmental impact report is required. The MND addresses each issue in Appendix G of the State CEQA Guidelines, and provides

analysis and supporting documentation for all conclusions. The MND found no evidence of significant environmental impacts that cannot be mitigated to below a level of significance. Therefore, in accordance with Section 15070(b) of the State CEQA Guidelines, a MND is the appropriate CEQA document for this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Coyne".

Michael Coyne, AICP  
Associate Planner

Cc: Lindsay Puckett, City Attorney's Office (BB&K)  
Patsy Bell, City Clerk  
File



### **Significant Ruling by the Supreme Court of California considering GHGs**

The Supreme Court of California issued a ruling November 30, 2015 that offers additional guidance for evaluation and processing of projects with GHG impacts. [Center for Biological Diversity v. California Department of Fish & Wildlife, S217763]

Consistent with this decision, substantial evidence has been provided that the project has cumulatively significant adverse impacts to climate that are feasible to avoid or mitigate, but have not been. CEQA requires the lead agency to evaluate and apply feasible mitigation measures and then provide a statement of overriding considerations for any significant impacts that remain if the project is to be approved. The Draft MND fails in both regards.

The Court affirmed that local government carries the burden of evaluating projects' climate impacts. Failure to provide substantial evidence to support a finding of no significance (which is the case here) deprives the public of information needed to determine the significance of the project's GHG impacts.

Furthermore, the Court affirmed that GHG impacts are global and should be considered in the context of the global problem. Meeting state goals depends upon increased efficiency and conservation measures applicable all the way down to the level of individuals.

Please include us on the recirculation list for a full environmental impact report.

Thank you for considering these comments.



Van K. Collinsworth  
Geographer / Director, Preserve Wild Santee

